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UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA—SANTA ANA DIV.

In re

THE LITIGATION PRACTICE
GROUP, P.C.,

Debtor.

Bankruptcy Case No. 8:23-bk-10571-SC
Chapter 11

NOTICE OF MOTION AND MOTION OF
HAN TRINH FOR AN ORDER GRANTING
ALLOWANCE AND PAYMENT OF
ADMINISTRATIVE CLAIM, PURSUANT
TO 11 U.S.C. §503(b)(1)(A)(i); HAN TRINH
DECLARATION W/EXHS., PHUONG
(AKA JAYDE) TRINH DECLARATION,
KATHLEEN P. MARCH, ESQ
DECLARATION W/EXHS.

Hearing on this Motion (and on other parties'
Motions) for allowance and payment of
administrative claim are all set for:

Date: January 19, 2024

Time: 11:00 a.m.

Place: Courtroom of Bankruptcy Judge Scott
Clarkson, by Zoom or in person at:
411 West Fourth Street, Courtroom 5C
Santa Ana, CA 92701-4593

NOTICE OF MOTION

**TO CHAPTER 11 TRUSTEE RICHARD MARSHACK, AND TO THE
OFFICE OF THE UNITED STATES TRUSTEE, AND TO ALL OTHER
PARTIES IN INTEREST, AND TO COUNSEL OF RECORD FOR ALL OF
THESE PARTIES:**

PLEASE TAKE NOTICE that on January 19, 2024 at 11:00 a.m., in the
United States Bankruptcy Court for the Central District of California, Santa Ana
Division, either in person at 411 West Fourth Street, Courtroom 5C, Santa Ana, CA
92701-4593 or by Zoom, to be determined by the Court, Han Trinh (“Han”) will and
does move for an Order granting allowance and payment of Han’s herein Motion for
allowance and payment of Han’s administrative claim, pursuant to 11 U.S.C.
§503(b)(1)(A).

PLEASE TAKE FURTHER NOTICE that the Motion is based on this
Notice, the attached Memorandum of Points & Authorities, the attached Declaration
of Han Trinh, with attached exhibits, the attached Declaration of Phuong (aka Jayde)
Trinh, and on the attached Declaration of Kathleen P. March, Esq., with attached
exhibits, plus on any additional matter of which the Court may take judicial notice,
including pleadings and documents filed in this case.

PLEASE TAKE FURTHER NOTICE that, pursuant to Local Bankruptcy
Rule 9013-1(f), that no later than fourteen (14) days before the above stated hearing
date set forth above, any Response/Opposition to the Motion must be written and

1 must be filed in Bankruptcy Court, CD CA, at 411 W. Fourth Street, Santa Ana,
2 California, 92701, and must be served upon counsel for Han Trinh as listed on the
3 upper-left hand of the first page of this Notice and Motion. A copy of
4
5 Response/Opposition must be delivered to chambers of the Hon. Scott Clarkson,
6 United States Bankruptcy Court, 411 W. Fourth Street, Suite 5130, Santa Ana,
7 California, 92701-4593, if over 25 pages long.
8

9 **PLEASE TAKE FURTHER NOTICE** that the failure to respond in writing
10 by the above stated deadline may be deemed by the Court to be a lack of objection to
11 the relief requested in the Motion.
12

13 Dated: November 17, 2023

THE BANKRUPTCY LAW FIRM, PC

14 /s/ Kathleen P. March

15 By: Kathleen P. March, Esq

16 *Attorneys for Han Trinh on this Motion*
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MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF
HAN TRINH’S MOTION FOR ALLOWANCE AND PAYMENT OF
ADMINISTRATIVE CLAIM

I. CONTROLLING LAW IS 11 USC §503(b)(1)(A)(i)

The controlling law on Han Trinh’s Motion for Allowance and Payment of Administrative Claim is 11 USC §503(b)(1)(A)(i), which states:

“(b) After notice and a hearing, there shall be allowed administrative expenses, other than claims allowed under section 502(f) of this title, including—
(1)(A) the actual, necessary costs and expenses of preserving the estate including—
(i) **wages, salaries and commissions for services rendered after the commencement of the case;**”

II. FACTS ENTITLING HAN TO ALLOWANCE AND PAYMENT OF THIS ADMINISTRATIVE CLAIM FOR SALARY LPG OWES HAN, FOR 11 FULL WORK-WEEKS OF POSTPETITION WORK HAN PERFORMED FOR LPG

Han makes this Motion for Allowance and Payment of Administrative Claim, seeking allowance and payment of unpaid salary the bankruptcy estate of bankruptcy debtor Litigation Practice Group PC (“LPG”) owes Han, a W-2 employee of LPG, for work Han did for LPG, **post-petition**, from 3/20/23 (date LPG filed bankruptcy) through 6/2/23 (the date Trustee Marshack, by his attorney Celetino, first informed Han and Jayde Trinh he was appointed and in charge. 6/2/23 is the date Marshack, by

1 his field agents, and locked Han, Jayde, and other employees out) (Han Decl hereto).
2 That is 11 full 5-day work weeks of work.

3 From 01/29/21 through 6/2/23, Han was employed as a W-2 employee of LPG.
4 When first employed, Han's started at an hourly rate of \$17.31 and eventually
5 increased to an annual salary of \$300,000 per year, the salary in effect during the 11
6 weeks of work in this Motion. (Han Decl hereto, Jayde Decl hereto)
7

8 Attached as to Han's Declaration hereto, as **Exhibit A** is a Paychex "pay stub"
9 for Han, showing the last paycheck Han received from LPG. That Paychex "pay stub"
10 shows Han was being paid \$11,538.47 per a 2 week pay period (pay period of
11 2/13/23/ to 2/26/23). A year has 52 weeks in it, which is 26 two week pay periods.
12 $\$11,538.47 \times 26 = \$300,000$ salary per year (plus the additional benefits and penalties
13 discussed infra). $\$11,538.47$ per 2 week pay period = $\$5,769.23$ per week. For the 11
14 full work- weeks Han worked post-petition, LPG owes Han $\$5,769.23$ per week x 11
15 weeks = **\$63,461.54** salary that LPG owes Han for her **post-petition** work from
16 3/20/23 through 6/2/23. (Han Decl hereto)
17

18 The Declaration of Kathleen P. March, Esq. hereto attaches, as **Exhibit A** to
19 March Declaration, the relevant pages of LPG's pacer bankruptcy docket. The pacer
20 docket shows LPG filed its Chapter 11 bankruptcy case on 3/20/23, and was originally
21 a debtor in possession. Per the Declarations of Han and Jayde Trinh hereto, Tony
22 Diab and attorney Daniel March, were in charge of LPG before LPG filed bankruptcy,
23 and continued to be in charge of LPG after LPG filed bankruptcy. Han Trinh's
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1 Declaration hereto attests that toward the end of March 2023, Tony Diab told Han and
2 Jayde, that they, and the other LPG employees still in LPG's offices in Tustin, should
3 keep working for LPG, that LPG would keep running for a year, and that attorney Dan
4 March of LPG, and Diab, would have the bankruptcy court approve LPG paying the
5 salaries of Han, Jayde, and the other employees of LPG. (Jayde Decl, Han Decl) Han
6 and Jayde kept working for LPG, partly at LPG's offices in Tustin, and partly
7 remotely, until May 29, 2023, when LPG's rented space was released to the landlord,
8 per relief from stay, and the landlord ordered everyone out of the Tustin offices by
9 6:00 AM on May 30, 2023. After the landlord took back LPG's offices, until 6/2/23,
10 Han and Jayde worked remotely. (Jayde Decl., Han Decl)

14 In their 2 plus years as LPG employees, to and including 6/2/23, Han and Jayde
15 were **essential** employees of LPG, because Han and Jayde were the LPG employees
16 who administered approximately 28,000 active litigation files of LPG clients,
17 including hiring, managing, assigning, and monitoring performance of attorneys to
18 represent LPG clients, for clients whose matters were not resolved short of law suit.
19 (Jayde Decl, Han Decl). They were the only LPG employees administering LPG's
20 28,000 active litigation files. (Han Decl, Jayde Decl)

24 Han and Jayde continued to do this work for LPG, administering LPG's
25 thousands of active litigation files, during their 11 weeks of work Han and Jayde did
26 for LPG **postpetition**. (Han Decl, Jayde Decl) During those 11 weeks, Han and Jayde
27 continued to respond to the many emails sent to LPG every day, by LPG's clients
28

(people with debt problems who had contracted with LPG to represent them in trying to resolve/defend those clients' debt problems). (Jayde Decl., Han Decl.) Those LPG clients emailed LPG asking where were their attorneys, what was status on their matters, etc. (Han Decl, Jayde Decl)

The last salary that LPG paid Han was submitted on 3/3/23 but not funded until 3/10/23 through LPG's payroll processor "Paychex". **Exhibit A** to Han's Declaration to this Motion is a true and correct copy to Han's "Paychex" salary check. (Han Decl). **Exhibit A** shows the check stub was delivered to Han on 3/3/23 but was paying for work done for LPG from 2/13/23 to 2/26/23.

Unbeknownst to Han and Jayde Trinh until 6/2/23, on 5/8/23 the Bankruptcy Court had entered an Order [Dkt65] granting Application of USTrustee to appoint Richard Marshack as Chapter 11 Trustee for LPG. That Order is **Exhibit B** to Declaration of attorney Kathleen P. March hereto. It was not served on Han or Jayde Trinh. The relevant pages of LPG's bankruptcy case pacer docket are **Exhibit A** to March Decl. hereto).

On 5/25/23 Marshack filed adversary proceeding 8:23-ap-01046-SC [dkt entry 93 on main case docket]. The pacer docket shows that the summones for that adversary proceeding, to serve Han, Jayde, and Greyson, was not issued until 6/2/23—a week **after** the 5/26/23 lockout order and preliminary injunction [dkt.13] was granted.. As soon as he filed his adversary proceeding, Marshack, on 5/25/23 filed **under seal**, a motion [dkt.4 in adversary proceeding docket], moving for lockout

1 and preliminary injunction. Marshack's motion to seal is dkt 3 in adv proc docket and
2 is attached as **Exhibit E** to this Declaration. Marshack's Motion to seal states
3 Marshack requests sealing because Marshack does not want to alert debtor to
4 Marshack's investigation and strategy. BkyCt's order granting sealing is dkt.11 in
5 adv proceeding, and is attached as **Exhibit F** to March Decl hereto).

7 The adversary proceeding docket is **Exhibit C** to March Decl, and shows
8 Motion for lockout and preliminary injunction was **filed under seal**. By Order entered
9 5/26/23 [dkt13 in the adversary proceeding docket], the Bankruptcy Court granted
10 Trustee's Motion for lockout and preliminary injunction. That Lockout and
11 Preliminary injunction Order [dkt.13], granted 5/26/23 is **Exhibit D** to March Decl.

14 Han and Jayde had no notice or knowledge that trustee had filed that adversary
15 proceeding, or that trustee had moved for lockout and preliminary injunction, or that
16 such a Lockout Order and Preliminary Injunction [dkt13 in the adversary proceeding
17 docket] had been granted by the Bankruptcy Court on 5/26/23, until Trustee's attorney
18 Celentino spoke to Han Trinh by phone on 6/2/23, and Trustee personnel locked
19 certain Greyson personnel out of the Greyson offices, also on 6/2/23. (Jayde Decl,
20 Han Decl). Jayde and Han were still administering thousands of LPG litigation files,
21 from when LPG filed bankruptcy on 3/20/23, up to 6/2/23. (Han Decl., Jayde Decl).

25 Though Marshack was appointed on 5/8/23, Marschack **concealed** this fact
26 from Han and Jayde Trinh, until 6/2/23, (Han Decl, Jayde Decl). 6/2/23 was the first
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1 date on which any of Marshack, or Marshack's attorneys, or Marshack's field agents,
2 **first contacted** Jayde Trinh, and Han Trinh, in any manner. (Jayde Decl, Han Decl).

3
4 On 6/2/23, Tony Diab conferenced Han into a phone call with Diab and with
5 Marshack's attorney Celentino. (Han Decl). In that call, Celentino told Han that
6 Marshack has been appointed as Chapter 11 Trustee, that Celentino was Marshack's
7 special counsel, that Tony Diab was no longer in control of debtor LPG, that
8 Marshack was now in control of debtor LPG, and that Marshack had obtained an
9 Order of the Bankruptcy Court **locking out** certain Greyson personnel (including
10 locking out Jayde and Han) from the Greyson Law Center PC offices located at 3345
11 Michelson Dr., Irvine, CA, 92612, Suite 400. (Han Decl). That phone conversation
12 was the first time Han found out any of these things. (Han Decl). Han then told this
13 information to Jayde. Jayde did not hear from the Trustee or Celentino until Jayde was
14 served, by mail, with a copy of the 6/2/23 lockout order, which arrived several days
15 after 6/2/23. (Jayde Decl).

16
17 Despite Trustee getting the lockout order and preliminary injunction against
18 Greyson, on 5/26/23 [dkt.13 in adversary proceeding docket, attached as **Exhibit D** to
19 March Declaration, by alleging Greyson was an alter ego of debtor LPG, Trustee's
20 counsel Celentino later admitted, at the hearing held 6/12/23, that Greyson was **NOT**
21 **an alter ego** of debtor LPG. **Exhibit G** to March Declaration are pages 33-34 of the
22 6/12/23 hearing transcript, where Celentino admitted this.

1 The Declaration of attorney March hereto attests that trustees usually promptly
2 inform parties in interest that they have been appointed. But here, the LPG main case
3 pacer docket, and adversary proceeding docket, shows Trustee Marshack and his
4 attorneys concealed that Trustee Marshack had been appointed, concealed (by not
5 having summonses issued until 6/2/23) that on 5/25/23, Trustee had filed an adversary
6 proceeding (8:23-ap-01046-SC) against Tony Diab and many additional defendants,
7 including Han and Jayde Trinh and Greyson; concealed that on 5/25/23, Trustee had
8 moved for a lockout order and preliminary injunction in that adversary proceeding,
9 with Trustee's motion for lockout order and preliminary injunction being filed under
10 seal; and concealed that on 5/26/23, Trustee's motion for lockout and preliminary
11 injunction had been granted by an Order [dkt13 in adversary proceeding docket,
12 attached as Exhibit D to March Decl].

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17 The result, as Han and Jayde's declarations hereto attest, is that Han and Jayde
18 had no notice or knowledge of any of these things Trustee had done, until 6/2/23,
19 when Trustee's attorney Celentino first spoke to Han by phone, and when trustee
20 personnel arrived on 6/2/23 and locked Han, Jayde and other Greyson personnel out of
21 the Greyson offices at 3345 Michelson Dr., Irvine, CA, 92612, Suite 400, on 6/2/23.
22

23
24 When Trustee personnel performed the lockout on 6/2/23, only Trustee
25 personnel and certain Greyson staff that Trustee personnel instructed to continue
26 working—NOT Han and Jayde---were allowed into the Greyson offices. (Jayde Decl,
27 Han Decl).
28

Due to Trustee's failure to notify Han or Jayde Trinh of any of the above, until Celentino spoke to Han Trinh on 6/2/23 (as Trustee personnel were performing the lockdown), Han and Jayde are entitled to be paid for the essential work they did for LPG, from 3/20/23 to 6/2/23. (Jayde Decl, Han Decl, March Decl).

III. PENALTY FOR LATE PAYMENT OF SALARY GETS ADDED TO SALARY, PURSUANT TO CALIFORNIA LABOR CODE § 203.

In addition to that \$63,461.54 of salary, discussed in **II.** supra, LPG owes Han late payment penalties per non-bankruptcy law, for not paying Han her salary as it came due) for the 11 full weeks of post-petition work that Han did for LPG, from 3/20/23 (date LPG filed bankruptcy) to 6/2/23 (date Chapter 11 Trustee Marshack, by his attorney Celentino, first contacted Han telling her that he was in charge and had obtained a lockdown order and preliminary injunction from the Bankruptcy Court).

Bankruptcy debtors are required to comply with non-bankruptcy laws, such as laws requiring employers to pay their W-2 employees timely, and assessing penalties against an employer who fails to pay a W-2 employee timely. Here, non-bankruptcy law is California Labor Code §203. Section 203(a) requires an employer (here LPG) which fails to pay a W-2 employee the employee's salary on time, to pay penalties—for up to 30 days--for each day the pay is late. Specifically, California Labor Code §203 (a) states:

“(a) If an employer willfully fails to pay, without abatement or reduction, in accordance with Sections 201, 201.3, 201.5, 201.6, 201.8, 201.9, 202, and 205.5, any wages of an employee who is discharged or who quits, the wages of the employee shall continue as a penalty from the due date

thereof at the same rate until paid or until an action therefor is commenced; but the wages shall not continue for more than **30 days**. An employee who secretes or absents themselves to avoid payment to them, or who refuses to receive the payment when fully tendered to them, including any penalty then accrued under this section, is not entitled to any benefit under this section for the time during which the employee so avoids payment.

(b) Suit may be filed for these penalties at any time before the expiration of the statute of limitations on an action for the wages from which the penalties arise.”

Because LPG still has not paid Han for Han’s 11 workweeks of post-petition W-2 work for LPG, LPG owes Han **30 days** of penalties, pursuant to California Labor Code §203(a). The statutory penalty is daily wage x 30 days. Han’s daily wage was \$1,153.85 per day, calculated as follows: Start with \$300,000 annual salary, divide by 26 pay periods = \$11,538.46 per pay period. Then divide \$11,538.46 by 10, because there are 10 working days in each 2 week pay period = \$1,153.85 per day. Then multiply the \$1,153.85 per day salary x 30 days of penalty = LPG owes Han **\$34,615.38** in penalties. (March Decl, Han Decl).

IV. PURSUANT TO CA LABOR CODE § 227.3, HAN IS ENTITLED TO BE PAID FOR ACCRUED VACATION TIME, FOR WHICH SHE DID NOT TAKE VACATION

California Labor Code § 227.3 states:

“Unless otherwise provided by a collective-bargaining agreement, whenever a contract of employment or employer policy provides for paid vacations, and an employee is terminated without having taken off his vested vacation time, **all vested vacation shall be paid to him as wages at his final rate**”.

Han's Declaration hereto attests that LPG owes Han for 264.88 hours of vacation Han accrued but had not taken off, as of 6/2/23. Per the statute, all vested vacation was required to be paid to Han on the final date Han was employed by LPG, which was 6/2/23. That 264.88 hours of vacation adds to \$38,203.64 calculated by taking Han's daily rate of \$1,153.85 per day (discussed in III supra) and dividing that by 8 as there are 8 hours in a non-overtime workday. \$1,153.85 divided by 8 = \$144.23 per hour. \$144.23 per hour x 264.88 hours = \$38,203.64.

V. LPG'S BANKRUPTCY ESTATE OWES HAN \$14,433.56 FOR HAN'S PERSONAL ITEMS, WHICH WERE IN HAN'S OFFICE AT GREYSON, WHEN HAN WAS LOCKED OUT OF HAN'S OFFICE BY TRUSTEE PERSONNEL, ON 6/2/23, BUT THEN "DISAPPEARED" FROM THAT LOCKED OFFICE

Han had items Han owned personally in the Greyson Law Center PC office Han occupied, which Trustee personnel locked Han out of, on 6/2/23, changing the lock to the door. (Han Decl). Han's personally owned items in Han's office at Greyson, when Trustee's field agents locked Han out of Han's office, on 6/2/23, included that Han owned an 86 inch screen TV, which was installed on the wall of Han's office, bolted to the wall. Plus Han owned an oriental vase which was a present to Han by persons unrelated to LPG. Plus Han personally owned computers/computer equipment and additional items Han had bought, with Han's own money. (All in Han Decl hereto)

1 The LPG bankruptcy estate owes Han for Han's personally owned items
2 Trustee's field agents "lost" from that locked office, locked by Trustee's field agents
3 on 6/2/23. **Exhibit B** to Han's Declaration hereto is a list of what Han paid for those
4 items which Trustee personnel "lost" from Han's locked office, which Han will now
5 have to replace. The amount owed to Han, by the bankruptcy estate, for Han's
6 personally owned items, which "disappeared" from the locked office, is **\$14,433.56** as
7 shown on **Exhibit B**. (Han Decl)
8

10 Trustee's field agents told Han that they could not locate Han's 86 inch screen
11 TV, even though that TV was installed on the wall in the office Han occupied, **bolted**
12 **to the wall of that office**. (Han Decl)
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14 Han's counsel March had to send multiple emails to Trustee counsel
15 Christopher Ghio, to get Han's TV and any other belongings returned to Han. (March
16 Decl)
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18 It took Han several trips to that locked office, for Han to get her TV back,
19 which was still installed, bolted to the wall in the locked office, and which Han had to
20 bring workers to remove from the wall. (Han Decl) Trustee's field agents simply lied,
21 when they told Han they could not locate Han's 86 inch TV, even after Han explained
22 that TV was in the locked office—bolted to the wall--that Trustee's field agents had
23 locked Han out of, on 6/2/23. (Han Decl).
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26 VI. CONCLUSION

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Pursuant to 11 USC §503(b)(1)(A)(i), LPG's bankruptcy estate owes Han \$63,461.54 W-2 salary unpaid salary, for Han's post-petition work for LPG of, plus owes Han late pay penalties of \$34,615.38, plus owes Han vacation pay of \$38,203.64. Together those items add to \$136,280.56 owed to Han by the LPG bankruptcy estate. For all of the reasons discussed herein, Han Trinh respectfully requests that this Court issue an order granting Han's Motion, allowing Han an \$136,280.56 administrative claim, pursuant to 11 USC §503(b)(1)(A)(i), and ordering the LPG bankruptcy estate to forthwith pay Han \$136,280.56.

In addition, the LPG bankruptcy estate owes Han \$14,433.56, also pursuant to 11 USC 503, for Han's personally owned items that "disappeared" from Han's office, after Trustee Marshack had Marshack's field agents locked Han out of Han's office at Greyson, on 6/2/23.

Dated: November 17, 2023

THE BANKRUPTCY LAW FIRM, PC

_____/s/ Kathleen P. March _____
By: Kathleen P. March, Esq
Attorneys for Han Trinh

DECLARATION OF HAN TRINH

I, Han Trinh (“Han”) declare:

1. I am the Movant in my herein Motion moving the Bankruptcy Court, pursuant to 11 USC §503(b)(1)(A)(i), to grant allowance of, and payment of, from the bankruptcy estate of debtor Litigation Practice Group, PC (“LPG”), my unpaid salary for work I performed for LPG **post-petition**, plus my unpaid vacation pay owed per California state law, plus late-pay penalties owed per California state law.

2. LPG owes me for all 3 of these items, for which LPG has paid me ZERO, as of the date I am filing my herein Motion, in LPG’s Chapter 11 bankruptcy case.

3. **\$63,461.54** is owed me for my W-2 unpaid **salary**, for my **post-petition work** for LPG from 3/20/23 (date LPG filed bankruptcy) through 6/2/23 (date Trustee Marshack had his field agents lock me and Jayde Trinh (“Jayde”) out of our offices at Greyson Law Center PC (“Greyson”). That is 11 full 5-day work-weeks of work.

4. Plus, LPG owes me **late-pay penalties**, owed per California law, of **\$34,615.38**, for not paying the \$63,461.54 salary from 6/2/23 to present.

5. Plus, LPG owes me vacation pay of **\$38,203.64** owed per California law, for vacation I had earned, but had not taken, as of 6/2/23-- the date Marshack’s field agents locked me and Jayde Trinh (“Jayde”) out of our offices.

6. Together those three items add to **\$136,280.56** owed to me by the LPG bankruptcy estate.

1 7. I was employed by LPG as a W-2 employee, from 1/29/21 through
2 6/2/23. When first employed, I started work at an hourly rate of \$17.31. LPG
3 thereafter increased my salary. By the time I was doing the 11 weeks of work from
4 3/20/23 to 6/2/23, my salary at LPG was \$300,000 per year.
5

6 8. Attached as **Exhibit A** to this Declaration is a Paychex “pay stub” for
7 me, showing the last paycheck I received from LPG. That Paychex “pay stub” shows
8 I was being paid \$11,538.47 for that 2 week pay period (pay period of 2/13/23/ to
9 2/26/23). A year has 52 weeks in it, which is 26 two week pay periods. $\$11,538.47 \times$
10 $26 = \$300,000$ salary per year (plus the additional benefits and penalties discussed
11 infra). $\$11,538.47$ per 2 week pay period = $\$5,769.23$ per week. For the 11 full work-
12 weeks I worked post-petition, LPG owes me $\$5,769.23$ per week $\times 11$ weeks =
13 **\$63,461.54** salary, that LPG owes me for my **post-petition** work I did for LPG, from
14 3/20/23 through 6/2/23.
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18 9. Around the first week of April 2023, Tony Diab and attorney Daniel
19 March of LPG-- who had been in charge of LPG during the years Jayde and I had
20 worked for LPG-- told me that LPG had filed bankruptcy, and that Diab and Dan
21 March would continue to be in charge of LPG, now that LPG had filed bankruptcy.
22 They told me that Jayde and I and the other LPG W-2 employees that were left
23 should continue working for LPG, that LPG would keep running for a year, and that
24 attorney Dan March and Diab would have the bankruptcy court approve LPG paying
25 the salaries of me, Jayde, and the other remaining employees of LPG. I kept
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1 working for LPG, based on Tony Diab's telling me that Diab and attorney Dan
2 March of LPG would get the Bankruptcy Court to approve LPG paying the salaries of
3 me, Jayde, and the other LPG W-2 employees.
4

5 10. Jayde and I worked partly at LPG's offices in Tustin, and partly
6 remotely, until May 29, 2023, when LPG's rented space was released to the landlord,
7 per relief from stay, and the landlord ordered everyone out of the Tustin offices by
8 6:00 AM on May 30, 2023. After the landlord took back LPG's offices, until 6/2/23, I
9 worked remotely.
10

11 11. In our 2 plus years as LPG employees, to and including 6/2/23, Jayde and
12 I were essential employees of LPG, because Jayde and I were the LPG employees
13 who administered approximately 28,000 active litigation files of LPG clients,
14 including hiring, managing, assigning, and monitoring performance of attorneys to
15 represent LPG clients, for clients whose matters were not resolved short of lawsuits.
16 Jayde and I were the only LPG employees administering LPG's 28,000 active
17 litigation files. Without us administering LPG's 28,000 active litigation files, LPG
18 could not carry on its business.
19

20 12. Jayde and I continued to do this essential work for LPG, administering
21 LPG's thousands of active litigation files, during their 11 weeks of work Jayde and I
22 did for LPG post-petition. During those 11 weeks, Jayde and I continued to respond
23 to the many emails sent to LPG every day, by LPG's clients (people with debt
24 problems who had contracted with LPG to represent them in trying to resolve/defend
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1 those clients' debt problems). Those LPG clients emailed LPG asking where were
2 their attorneys, what was status of their lawsuits, etc.

3
4 13. The last salary check that LPG paid me, was paid to me on 3/3/23,
5 through LPG's payroll processor "Paychex". **Exhibit A** to hereto is a true and
6 correct copy to my "Paychex" salary paystub. **Exhibit A** shows my paycheck from
7 LGP was delivered to me on 3/3/23 but was paying for work I did for LPG from
8 2/13/23 to 2/26/23. Though delivered to me on 3/3/23, it was not funded until
9 3/10/23 and posted in my bank account on 3/13/23.

10
11
12 14. Unbeknownst to me and Jayde--until 6/2/23 (the date Trustee's field
13 agents locked us out of our offices at Greyson)--the Bankruptcy Court had on 5/8/23
14 entered an Order [Dkt65] granting the Application of the Office of US Trustee, to
15 appoint Richard Marshack as Chapter 11 Trustee for LPG. Jayde and I had no notice
16 or knowledge that a Trustee had been appointed. We had no notice or knowledge
17 that Trustee Marshack had on 5/25/23 filed an adversary proceeding and on 5/25/23
18 filed a Motion (**under seal**) for Lockout Orders and Preliminary Injunction against
19 many defendants named in the adversary proceeding, including me, Jayde and
20 Greyson. Though Greyson, Jayde and I were all named as defendants in that
21 adversary proceeding, the adversary proceeding pacer docket--attached to attorney.
22 March's Declaration hereto--shows no summons were issued, to be served on me,
23 Jayde, or Greyson, until 6/2/23. 6/2/23 was 7 days **after** 5/26/23, the date Trustee
24 obtained his Lock-Out Order and Preliminary Injunction [dkt13 in the adversary
25
26
27
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1 proceeding docket, attached as an exhibit to March Decl hereto] against me, Jayde,
2 Greyson and numerous additional defendants.

3 15. I did not find out about any of the things stated in paragraph 14, until
4 6/2/23, when Trustee Marshack's attorney, Celentino spoke to me by phone on
5 6/2/23, and when Trustee's personnel locked me, Jayde, and other Greyson
6 personnel out of the Greyson's office on 6/2/23.
7

8 16. Jayde and I were still administering thousands of LPG litigation files,
9 from when LPG filed bankruptcy on 3/20/23, up to 6/2/23.
10

11 17. Though Marshack was appointed on 5/8/23, Marshack concealed the
12 activities stated in paragraph 14 supra, from me and Jayde and Greyson, until 6/2/23.
13 6/2/23 was the first date on which any of Marshack, or Marshack's attorneys, or
14 Marshack's filed agents, **first contacted** me and Jayde, in any manner.
15

16 18. On 6/2/23, Tony Diab conferenced me into a phone call with Diab and
17 with Marshack's attorney Celentino. In that call, Celentino told me that Marshack
18 has been appointed as Chapter 11 Trustee, that Celentino was Marshack's special
19 counsel, that Tony Diab was no longer in control of debtor LPG, that Marshack was
20 now in control of debtor LPG, and that Marshack had obtained an Order of the
21 Bankruptcy Court **locking out** certain Greyson personnel (including locking out me
22 and Jayde) from the Greyson Law Center PC offices located at 3345 Michelson Dr.,
23 Irvine, CA, 92612, Suite 400. That phone conversation was the first time I found out
24 any of these things. I told Celentino I had told the Greyson staff they were not
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1 required to continue working, that they could go home, because there was no money
2 to pay them. Celentino told me to call the Greyson staff back to work.

3
4 19. After my phone call with Celentino, I told Jayde what had been said in
5 that conversation. To my knowledge, Jayde did not hear from the Trustee or
6 Celentino or any other Trustee personnel, until Jayde was served, by mail, with a
7 copy of the 6/2/23 lockout order, which arrived several days after 6/2/23.
8

9 20. In addition to the \$63,461.54 of salary that LPG owes me for my 11
10 weeks of post-petition work for LPG, LPG owes me **late payment penalties** per non-
11 bankruptcy law (California state law), for not paying me my W-2 salary as it came
12 due, for the **11 full weeks of post-petition work** I did for LPG, from 3/20/23 (date
13 LPG filed bankruptcy) to 6/2/23 (date Chapter 11 Trustee Marshack, by his attorney
14 Celentino, first contacted me telling me that he was in charge and had obtained a
15 lockout order and preliminary injunction from the Bankruptcy Court, and locked me,
16 Jayde and other Greyson staff out of Greyson's offices pursuant to that order, and
17 froze Greyson's bank accounts, prevented us from accessing Greyson's email,
18 prevented us from accessing Greyson's website, etc.
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22 21. The whole lockout was wrongful and preliminary injunction was
23 wrongful as to Greyson, as to me, and as to Han, because it was based on Trustee's
24 erroneous, and unsupported, allegations that Greyson was an "alter ego" of LPG, and
25 Greyson was NOT an alter ego of LPG. At the hearing on 6/12/23, Trustee
26 Marshack's attorney Celentino admitted that Greyson was not an alter ego of LPG,
27
28

1 and amended Trustee's adversary proceeding, to remove the allegation that Greyson
2 was an alter ego of LPG. (March Decl hereto attaches, as **Exhibit G** to March
3 Declaration, pages 33-34 of the 6/12/23 hearing transcript, where Celentino stated "It
4 does not appear that Greyson is an alter ego" [of debtor LPG].
5

6 22. Because LPG still has not paid me for my 11 workweeks of post-
7 petition W-2 work for LPG, LPG owes me **30 days** of penalties, pursuant to
8 California Labor Code §203(a). The statutory penalty is daily wage x 30 days. My
9 daily wage was \$1,153.85 per day, calculated as follows: Start with \$300,000 annual
10 salary, divide by 26 pay periods = \$11,538.46 per pay period. Then divide
11 \$11,538.46 by 10, because there are 10 working days in each 2 week pay period =
12 \$1,153.85 per day. Then multiply the \$1,153.85 per day salary x 30 days of penalty =
13 LPG owes me **\$34,615.38** in penalties.
14
15
16

17 23. In addition, I am entitled to be paid for my vacation time that I earned,
18 but had not taken as of 6/2/23, the date I ceased to be employed by LPG. I accrued
19 LPG owes me payment for 264.88 hours of vacation I had accrued, but had not taken
20 off, as of 6/2/23. Jayde and I each accrued 6.16 hours of vacation time, for each 2
21 week pay period. Per the statute cited in the Memorandum of Points & Authorities
22 supra, all accrued (aka "vested") vacation, that had not been taken, was required to
23 be paid to me on the final date I was employed by LPG, which was 6/2/23. That
24 264.88 hours of vacation adds to **\$38,203.64**, calculated by taking my daily rate of
25 \$1,153.85 per day (discussed supra) and dividing that by 8 as there are 8 hours in a
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27
28

1 non-overtime workday. \$1,153.85 divided by 8 =\$144.23 per hour. \$144.23 per
2 hour x 264.88 hours = **\$38,203.64**.

3
4 24. In addition to being owed my salary, vacation pay, and late pay penalties,
5 I had items I owned personally in the office I occupied at Greyson, which Trustee
6 personnel locked me out of, on 6/2/23. These items include an 86 inch TV, which
7 was installed and bolted to the wall of my office, an oriental vase which was a
8 present to me, by persons unrelated to LPG along with computers/computer
9 equipment and additional items I had bought, with my own money.
10

11
12 25. The LPG bankruptcy estate owes me for the items Trustee's field agents
13 "lost" from the Greyson office, after they locked me out of it. **Exhibit B** to this
14 Declaration is a list of what I had paid for those "lost" items, which I will now have
15 to replace. The amount owed to me, by the bankruptcy estate, for my personally
16 owned items, which "disappeared"/were "lost" from the locked office, after the
17 lockout on 6/2/23, is **\$14,433.56** as shown on **Exhibit B**.
18

19
20 26. Trustee's field agent even told me that the field agents could not locate
21 my 86 inch TV, even though that TV was installed on the wall in the locked office I
22 occupied, **bolted to the wall of that office**. Trustee's field agent telling me she
23 could not locate my 86 inch screen TV, which was bolted to the wall in my Greyson
24 office that Trustee's field agent locked me out of, was a lie.
25

26
27 27. Attorney March had to send multiple emails to Trustee counsel
28 Christopher Ghio, to get my 86 inch TV returned to me. It took me several trips to

1 the locked Greyson offices, for me to get Trustee's field agents to give me back my
2 TV, my oriental vase, and a few other small items they eventually admitted they had.
3
4 I had to bring workers to remove the TV from where it was bolted to the wall.
5 Trustee's field agents simply lied, when they told me they could not locate my 86
6 inch TV, even after I told Trustee's field agents (and attorney March told Trustee's
7 attorney Ghio) that my TV was bolted to the wall in my office that that Trustee's
8 personnel had locked me out of on 6/2/23. Trustee personnel should not have been
9 allowed to act the way the Trustee's field agents acted, toward me.
10

11
12 I declare under penalty of perjury that the foregoing is true and correct and that
13 this Declaration is executed at Orange, California, on November 09, 2023.
14

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16 
17 HAN TRINH
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LITIGATION PRACTICE GROUP PC
17542 17th St Ste 100
Tustin CA 92780

LOC:LPG Law CA
EE ID: 1031 DD

HAN TRINH

NON-NEGOTIABLE

NON-NEGOTIABLE

PERSONAL AND CHECK INFORMATION			EARNINGS				
Han Trinh			BASIS OF PAY	DESCRIPTION	HRS/UNITS	RATE THIS PERIOD (\$)	YTD HOURS
Soc Sec #: xxx-xx-xxxx Employee ID: 1031				Salary		11538.47	
Home Department: 1 LPG CA				Holiday			M24.0000
Pay Period: 02/13/23 to 02/26/23				Total Hours			24.0000
Check Date: 03/03/23 Check #: 13033				Gross Earnings		11538.47	69230.82
NET PAY ALLOCATIONS				Total Hrs Worked			
DESCRIPTION	THIS PERIOD (\$)	YTD (\$)		Dir Dep Reimb			300.00
Check Amount	0.00	0.00		REIMB & OTHER PAYMENTS			300.00
Chkg 860	5297.84	32087.05	WITHHOLDINGS	DESCRIPTION	FILING STATUS	THIS PERIOD (\$)	YTD (\$)
NET PAY	5297.84	32087.05		Social Security		690.62	4143.73
				Medicare		161.52	969.10
				Fed Income Tax	SMS	1841.42	11048.52
				CA Income Tax	SMI2 1 0	739.71	4438.26
				CA Disability		100.25	601.50
				TOTAL		3533.52	21201.11
			DEDUCTION	DESCRIPTION		THIS PERIOD (\$)	YTD (\$)
				401k EE Pretax		2307.69	13846.14
				Medical Pre-tax		399.42	2396.52
				TOTAL		2707.11	16242.66
NET PAY						THIS PERIOD (\$)	YTD (\$)
						5297.84	32087.05

Payrolls by Paychex, Inc.

0942 1607-7926 Litigation Practice Group PC DBA • 17542 17th St Ste 100 • Tustin CA 92780 • (949) 715-0648

EXHIBIT A

DECLARATION OF PHUONG (AKA JAYDE) TRINH

I, Phuong Trinh (aka Jayde Trinh, and referred to as “Jayde” hereinafter),
declare:

1. I am the Movant in my herein Motion moving the Bankruptcy Court,
pursuant to 11 USC §503(b)(1)(A)(i), to grant allowance of, and payment of, from
the bankruptcy estate of debtor Litigation Practice Group, PC (“LPG”), my unpaid
salary for work I performed for LPG **post-petition**, plus my unpaid vacation pay
owed per California state law, plus late-pay penalties owed per California state
law.

2. LPG owes me for all 3 of these items, for which LPG has paid me ZERO,
as of the date I am filing my herein Motion, in LPG’s Chapter 11 bankruptcy case.

3. **\$52,884.64** is owed me for my W-2 unpaid **salary**, for my **post-petition**
work for LPG from 3/20/23 (date LPG filed bankruptcy) through 6/2/23 (date
Trustee Marshack had his field agents lock me and Han Trinh (“Han”) out of our
offices at Greyson Law Center PC (“Greyson”). That is 11 full 5-day work-weeks
of work.

4. Plus LPG owes me **late-pay penalties**, owed per California law, of
\$28,846.15, for not paying the \$52,884.64 salary from 6/2/23 to present.

1 5. Plus LPG owes me vacation pay of \$31,825.35 owed per California law,
2 for vacation I had earned, but had not taken, as of 6/2/23-- the date Marshack's field
3 agents locked me and Han Trinh ("Han") out of our offices.
4

5 6. Together 3 those items add to \$114,825.14 owed to me by the LPG
6 bankruptcy estate.
7

8 7. I was employed by LPG as a W-2 employee, from 11/29/20 through
9 6/2/23. When first employed, I started work at a salary of \$120,000. LPG
10 thereafter increased my salary. By the time I was doing the 11 weeks of work from
11 3/20/23 to 6/2/23, my salary at LPG was \$250,000 per year.
12

13 8. Attached as Exhibit A to this Declaration is a Paychex "pay stub" for me,
14 showing the last paycheck I received from LPG. That Paychex "pay stub" shows 1
15 was being paid \$11,538.47 for that 2 week pay period (pay period of 2/13/23/ to
16 2/26/23). A year has 52 weeks in it, which is 26 two week pay periods. $\$11,538.47$
17 $\times 26 = \$300,000$ salary per year (plus the additional benefits and penalties
18 discussed infra). $\$11,538.47$ per 2 week pay period = $\$5,769.23$ per week. For the
19 11 full work- weeks I worked post-petition, LPG owes me $\$5,769.23$ per week \times
20 11 weeks = \$52,884.64 salary, that LPG owes me for my post-petition work I did
21 for LPG, from 3/20/23 through 6/2/23.
22
23
24
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26 9. Around the first week of April 2023, Tony Diab and attorney Daniel
27 March of LPG-- who had been in charge of LPG during the years Han and I had
28

1 worked for LPG—told my sister, Han Trinh, that LPG had filed bankruptcy, and
2 that Diab and Dan March would continue to be in charge of LPG, now that LPG
3 had filed bankruptcy, that LPG would operate for a year, and that Han and I and
4 other LPG W-2 employees that were left should continue working for LPG, that
5 LPG would keep running for a year, and that attorney Dan March and Diab would
6 have the bankruptcy court approve LPG paying the salaries of me, Jayde, and the
7 other remaining employees of LPG. Han told me all this, and based on this, I kept
8 working for LPG, based on Tony Diab's telling me that Diab and attorney Dan
9 March of LPG would get the Bankruptcy Court to approve LPG paying the salaries
10 of me, Jayde, and the other LPG W-2 employees.
11

12
13
14 10. Han and I worked partly at LPG's offices in Tustin, and partly remotely,
15 until May 29, 2023, when LPG's rented space was released to the landlord, per
16 relief from stay, and the landlord ordered everyone out of the Tustin offices by
17 6:00 AM on May 30, 2023. After the landlord took back LPG's offices, until
18 6/2/23, I worked remotely.
19
20
21

22 11. In our 2 plus years as LPG employees, to and including 6/2/23, Han and I
23 were **essential** employees of LPG, because Han and I were the LPG employees
24 who administered approximately 28,000 active litigation files of LPG clients,
25 including hiring, managing, assigning, and monitoring performance of attorneys
26 to represent LPG clients, for clients whose matters were not resolved short of
27
28

1 lawsuits. Han and I were the **only** LPG employees administering LPG's 28,000
2 active litigation files. Without us administering LPG's 28,000 active litigation
3 files, LPG could not carry on its business.
4

5 12. Han and I continued to do this **essential** work for LPG, administering
6 LPG's thousands of active litigation files, during their 11 weeks of work Han
7 and I
8 did for LPG **post-petition**. During those 11 weeks, Han and I continued to respond to
9 the many emails sent to LPG every day, by LPG's clients (people with debt problems
10 who had contracted with LPG to represent them in trying to resolve/defend those
11 clients' debt problems). Those LPG clients emailed LPG asking where were their
12 attorneys, what was status of their lawsuits, etc.
13

14 13. The last salary check that LPG paid me, was paid to me on 3/3/23,
15 through LPG's payroll processor "Paychex". **Exhibit A** to hereto is a true and
16 correct copy to my "Paychex" salary paystub. **Exhibit A** shows my paycheck
17 from LGP was delivered to me on 3/3/23 but was paying for work I did for LPG
18 from 2/13/23 to 2/26/23. Though delivered to me on 3/3/23, it was not funded
19 until 3/10/23. As shown on Exhibit A, my gross pay for the 2 week period was
20 \$9,615.39, which is \$250,000 per year.
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1 14. Unbeknownst to me and Han--until 6/2/23 (the date Trustee's field agents
2 locked us out of our offices at Greyson)--the Bankruptcy Court had on 5/8/23
3 entered an Order [Dkt65] granting the Application of the Office of US Trustee,
4 to appoint Richard Marshack as Chapter 11 Trustee for LPG. Han and I had no
5 notice or knowledge that a Trustee had been appointed. We had no notice or
6 knowledge that Trustee Marshack had on 5/25/23 filed an adversary proceeding
7 and on 5/25/23 filed a Motion (**under seal**) for Lockout Orders and Preliminary
8 Injunction against many defendants named in the adversary proceeding,
9 including me, Han and Greyson. Though Greyson, Han, and I, were all named
10 as defendants in that adversary proceeding, the adversary proceeding pacer
11 docket--attached to attorney. March's Declaration hereto--shows no summonses
12 were issued, to be served on me, Jayde, or Greyson, until 6/2/23. 6/2/23 was 7
13 days **after** 5/26/23, the date Trustee obtained his Lock-Out Order and
14 Preliminary Injunction [dkt13 in the adversary proceeding docket, attached as
15 **Exhibit D** to March Decl hereto] against me, Han, Greyson and numerous
16 additional defendants.
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23 15. I didn't find out about any of the things stated in paragraph 14, supra,
24 until 6/2/23, when Trustee Marshack's attorney, Celentino spoke to Han by
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1 phone on 6/2/23, and when Trustee's personnel locked me, Han, and other
2 Greyson personnel out of the Greyson offices on 6/2/23.
3

4 16. Han and I were still administering thousands of LPG litigation files, from
5 when LPG filed bankruptcy on 3/20/23, up to 6/2/23.

6 17. Though Marshack was appointed on 5/8/23, Marschack concealed the
7 activities stated in paragraph 14 supra, from me and Han and Greyson, until
8 6/2/23. 6/2/23 was the first date on which any of Marshack, or Marshack's
9 attorneys, or Marshack's field agents, **first contacted** me or Han, in any manner,
10 so far as I am aware.
11
12

13 18. On 6/2/23, Han told me that Tony Diab conferenced Han into a phone
14 call with Diab and with Marshack's attorney Celentino. In that call, Celentino
15 told Han that Marshack has been appointed as Chapter 11 Trustee, that Celentino
16 was Marshack's special counsel, that Tony Diab was no longer in control of
17 debtor LPG, that Marshack was now in control of debtor LPG, and that
18 Marshack had obtained an Order of the Bankruptcy Court **locking out** certain
19 Greyson personnel (including locking out me and Han) from the Greyson Law
20 Center PC offices located at 3345 Michelson Dr., Irvine, CA, 92612, Suite 400.
21 When Han told me what was said by Celentino in that phone call on 6/2/23, that
22 was the first time I found out any of these things. Han told me that Han had told
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1 Celentino that the Greyson staff they were not required to continue working, that
2 they could go home, because there was no money to pay them. Han told me that
3 Celentino told Han to call the Greyson staff back to work.
4

5 19. I did not hear from the Trustee or Celentino or any other Trustee
6 personnel, until I was served, by mail, with a copy of the 6/2/23 lockout order,
7 which arrived several days after 6/2/23.
8

9 20. In addition to the \$52,884.64 of W-2 salary that the LPG bankruptcy
10 estate owes me for my 11 weeks of post-petition work for LPG, LPG owes me
11 **\$28,846.15** of **late payment penalties** per non-bankruptcy law (California state
12 law), for not paying me my W-2 salary as it came due, for the **11 full weeks of**
13 **post-petition work** I did for LPG, from 3/20/23 (date LPG filed bankruptcy) to
14 6/2/23 (date Chapter 11 Trustee Marshack, by field agents, locked me, Han and
15 other Greyson personnel out of Greyson's offices, froze Greyson's bank
16 accounts, prevented us from accessing Greyson's email, prevented us from
17 accessing Greyson's website, etc. The statutory penalty is daily wage x 30 days.
18 My daily wage was \$961.53 per day, calculated as follows: Start with \$250,000
19 annual salary, divide by 26 pay periods = \$9,615.38 per pay period. Then
20 divide \$9,615.38 by 10, because there are 10 working days in each 2 week pay
21 period = \$961.53 per day. Then multiply the \$961.53 per day salary x 30 days
22 of penalty = LPG owes me **\$28,846.15** in penalties.
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21. Plus, the LPG bankruptcy estate owes me vacation pay of \$31,094.35, for vacation time I accrued before 6/2/23, but had not taken. As of 6/2/23, I had accrued 258.71 hours of vacation, but had not taken that vacation. I accrued vacation at 6.16 hours per 2 week pay period. Per the statute discussed in Memorandum of P & A supra, all vested vacation was required to be paid to me on the final date I was employed by LPG, which was 6/2/23. That 258.72 hours of vacation adds to \$31,094.35, calculated by taking my daily rate of \$961.53 per day (discussed supra)) and dividing that by 8, as there are 8 hours in a non-overtime work day. $\$961.53 \div 8 = \120.19 per hour. $\$120.19 \text{ per hour} \times 258.71 \text{ hours} = \underline{\$31,094.35}$.

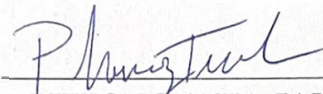
22. The whole lockout was wrongful and preliminary injunction was wrongful as to Greyson, as to me, and as to Han, because it was based on Trustee's erroneous, and unsupported, allegations that Greyson was an "alter ego" of LPG. Greyson was NOT an alter ego of LPG. At the hearing on 6/12/23, Trustee Marshack's attorney Celentino admitted that Greyson was not an alter ego of LPG, and amended Trustee's adversary proceeding, to remove the allegation that Greyson was an alter ego of LPG. (March Decl hereto attaches, as Exhibit G to March Declaration, pages 33-34 of the 6/12/23 hearing transcript, where Celentino stated "It does not appear that Greyson is an alter ego" [of debtor LPG].

23. Because LPG still has not paid me for my 11 workweeks of post-petition W-2 work for LPG, LPG owes me **30 days** of penalties, pursuant to California Labor Code §203(a). The statutory penalty is daily wage x 30 days. My daily wage was \$961.53 per day, calculated as follows: Start with \$250,000 annual salary, divide by 26 pay periods = \$9,615.38 per pay period. Then divide \$9,615.38 by 10, because there are 10 working days in each 2 week pay period = \$961.53 per day. Then multiply the \$961.53 per day salary x 30 days of penalty = LPG owes Jayde **\$28,846.15** in penalties.

24. In addition, I am entitled to be paid for my vacation time that I earned, but had not taken as of 6/2/23, the date I ceased to be employed by LPG. I accrued LPG owes me payment for 258.71 hours of vacation I had accrued, but had not taken off, as of 6/2/23. Han and I each accrued 6.16 hours of vacation time, for each 2 week pay period. Per the statute cited in the Memorandum of Points & Authorities supra, all accrued (aka “vested”) vacation, that had not been taken, was required to be paid to me on the final date I was employed by LPG, which was 6/2/23. That 258.71 hours of vacation adds to **\$31,094.35**, calculated by taking my daily rate of \$961.53 per day (discussed supra) and dividing that by 8 as there are 8 hours in a non-overtime workday. \$961.53 divided by 8 = \$120.19 per hour. \$120.19 per hour x 224.83 hours = **\$31,094.35**.

1 25. As additional compensation, LPG agreed, when it hired me, to pay my
2 student loans off, before those loans started to accrue interest, and did that.
3
4 Consequently, my herein Motion does not seek any payment relating to student
5 loan debt, as LPG paid that timely. As that was paid, it is not part of my herein
6 administrative claim.
7

8 I declare under penalty of perjury that the foregoing is true and correct and that
9 this Declaration is executed at Orange, California, on November 14,
10 2023.

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12 
13 **PHUONG (AKA JAYDE) TRINH**
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NOTICE OF MOTION AND MOTION OF PHUONG (AKA JAYDE) TRINH FOR AN ORDER GRANTING
ALLOWANCE AND PAYMENT OF ADMINISTRATIVE CLAIMS PURSUANT TO 11 U.S.C. §503(b)(1)(A);
DECLARATIONS OF JAYDE TRINH, HAN TRINH AND KATHLEEN P. MARCH, ESQ. W/EXHIBITS

LITIGATION PRACTICE GROUP PC
17542 17th St Ste 100
Tustin CA 92780

LOC:LPG Law CA
EE ID: 1032 DD

PHUONG TRINH

NON-NEGOTIABLE

NON-NEGOTIABLE

PERSONAL AND CHECK INFORMATION			EARNINGS				
Phuong Trinh			BASIS OF PAY	DESCRIPTION	HRS/UNITS	RATE THIS PERIOD (\$)	YTD HOURS
[REDACTED]				Salary		9615.39	48076.95
Soc Sec #: xxx-xx-xxxx Employee ID: 1032				Total Hours			
Home Department: 1 LPG CA				Gross Earnings		9615.39	48076.95
Pay Period: 02/13/23 to 02/26/23				Total Hrs Worked			
Check Date: 03/03/23 Check #: 13034				Dir Dep Reimb			500.00
NET PAY ALLOCATIONS				REIMB & OTHER PAYMENTS			500.00
DESCRIPTION	THIS PERIOD (\$)	YTD (\$)	WITHHOLDINGS	DESCRIPTION	FILING STATUS	THIS PERIOD (\$)	YTD (\$)
Check Amount	0.00	-12448.55		Social Security		591.20	2955.96
Chkg 643	6224.27	44069.93		Medicare		138.26	691.31
NET PAY	6224.27	31621.38		Fed Income Tax	SMS	1826.69	9133.45
				CA Income Tax	SMI2 1 0 No		
				TOTAL		2556.15	12780.72
			DEDUCTION	DESCRIPTION		THIS PERIOD (\$)	YTD (\$)
				401k EE Pretax		750.00	3750.00
				Medical Pre-tax		80.05	400.25
				PostTx EE healt		4.92	24.60
				TOTAL		834.97	4174.85
			NET PAY			THIS PERIOD (\$)	YTD (\$)
						6224.27	31621.38

Payrolls by Paychex, Inc.

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EXHIBIT A

DECLARATION OF KATHLEEN P. MARCH ESQ.

I, KATHLEEN P. MARCH, declare:

1. I am an attorney in good standing, admitted to practice law in California and New York. I own and run The Bankruptcy Law Firm, PC, counsel to Han and Jayde Trinh on their respective 11 USC 503(b)(1)(A)(i) Motions for Allowance and Payment of Administrative Claims.

2. Attached to my herein Declaration, as **Exhibit A**, are the relevant pages of debtor Litigation Practice Group PC's ("LPG") pacer bankruptcy docket. The pacer docket shows LPG filed its Chapter 11 bankruptcy case on 3/20/23, and was originally a debtor in possession.

28. Bankruptcy Court had, on 5/8/23, entered an Order [Dkt65], granting the Application of the Office of US Trustee, to appoint Richard Marshack as Chapter 11 Trustee for LPG. That Order [dkt.65] is **Exhibit B** to this Declaration. The Notice of Entry on that Order shows that Order was not served on Han or Jayde Trinh.

29. On 5/25/23 Marshack filed adversary proceeding 8:23-ap-01046-SC [dkt entry 93 on main case docket]. The relevant pages of the adversary proceeding pacer docket are **Exhibit C** hereto.

30. On 5/25/23-- the same day Marshack filed his adversary proceeding-- Marshack, filed **under seal**, a motion [dkt.4 in adversary proceeding docket], moving for lockout and preliminary injunction. Marshack's motion to seal is dkt 3 in adv proc docket (attached as **Exhibit E** to this Declaration), and states Marshack requests

1 sealing because Marshack does not want to alert debtor to Marshack's investigation
2 and strategy. BkyCt's order granting sealing is dkt.11 in adv proceeding (and is
3 attached as **Exhibit F** to this Declaration).
4

5 31. On 5/26/23 the Bankruptcy Court granted Trustee Marshack dkt.13, the
6 lockout and preliminary injunction order [copy of that Order is **Exhibit D** to this
7 Declaration. So far as the pacer docket for the adversary proceeding shows, no
8 defendants had notice of that 5/26/23 hearing, they hadn't been served with the
9 adversary proceeding or with Trustee's emergency motion for the lockout and
10 preliminary injunction order, and no defendants had notice on 5/26/23, that the
11 Bankruptcy Court had granted the 5/26/23 lockout and preliminary injunction Order.
12

13 32. That adversary proceeding docket shows that the summonses for that
14 adversary proceeding, to serve Han, Jayde, and Greyson with Trustee's adversary
15 proceeding complaint, were not issued until 6/2/23—which was a week **after** the
16 5/26/23 lockout order and preliminary injunction [dkt.13 in adv proc docket, attached
17 as **Exhibit D** hereto] was granted to Trustee Marshack by the Bankruptcy Court.
18

19 33. In my 35 years of bankruptcy experience, trustees usually promptly
20 inform parties in interest that they have been appointed as trustees. That is NOT the
21 case here. The LPG pacer docket shows Trustee Marshack and his attorneys
22 **concealed** that Trustee Marshack had been appointed; concealed (by not serving
23 summonses) that Trustee had filed an adversary proceeding (8;23-ap-01046-SC)
24 against Tony Diab and many additional defendants, including Han and Jayde Trinh
25
26
27
28

1 and Greyson Law Center PC; concealed that Trustee had moved for a lockout order
2 and preliminary injunction (by Trustee **filing** Trustee's emergency motion for lockout
3 order and preliminary injunction **under seal**); and concealed that Trustee's motion
4 for lockout and preliminary injunction had been granted on 5/26/23, until Trustee
5 personnel arrived to lock the Greyson personnel out of the Greyson offices at 3345
6 Michelson Dr., Irvine, CA, 92612, Suite 400, on 6/2/23.
7
8

9 34. Han and Jayde's Declarations hereto attest that when Trustee personnel
10 performed the lockout on 6/2/23, only trustee personnel and certain Greyson staff that
11 Trustee personnel instructed to continue working—NOT Han and Jayde---were
12 allowed into the Greyson offices.
13

14 35. Due to Trustee's failure to notify Han or Jayde Trinh of any of the above,
15 until Celentino spoke to Han Trinh on 6/2/23 (as Trustee personnel were performing
16 the lockout)--Han and Jayde are entitled to be paid for the **essential** work they did for
17 LPG, from 3/20/23 to 6/2/23.
18

19 36. Trustee's attorney Christopher Ghio, and Trustee's field agents, were
20 resistant to returning to Han Trinh, Han's personally owned items that had been
21 locked inside Han's office at Greyson, in the 6/2/23 lockout. I had to send multiple
22 emails to Trustee Marshack's attorney Christopher Ghio, Esq., to get Han's
23 personally owned 86 inch big screen TV returned to Han, by Trustee's field agents.
24 Ghio told me, in one of his emails to me, that Han's big screen TV could not be
25 located. That was obviously not correct, because that TV was still bolted to the wall
26
27
28

1 in Han's office at Greyson Law Center PC ("Greyson), which Trustee personnel had
2 locked Han out of on 6/2/23, changing the lock on that office.

3
4 37. Locking Greyson personnel out of the Greyson offices was error, because
5 Trustee Marshack obtained the 5/26/23 "Lockout" order and preliminary injunction,
6 against many defendants, including Greyson, based on false allegations of Trustee
7 declarants that Greyson was an alter ego of debtor LPG.

8
9 38. At the later hearing, held on 6/12/23, Trustee attorney Celentino
10 **admitted that Greyson was not an alter ego of LPG. Exhibit G** hereto is pages
11 33-34 of the 6/12/23 Bankruptcy Court hearing transcript, where Trustee's attorney
12 Celentino admitted that Greyson Law Center PC was not an alter ego of debtor LPG.

13
14 39. Greyson personnel, including Han, should not have been locked out of
15 Greyson's offices on 6/2/23. The LPG bankruptcy estate is liable to pay Han for
16 Han's personally owned items that "disappeared" from Han's office at Greyson, after
17 Trustee's field agents locked Han out of her office, on 6/2/23.

18
19
20 I declare under penalty of perjury that the foregoing is true and correct and that
21 this Declaration is executed at Los Angeles, California, on November 8, 2023.

22
23 _____/s/ Kathleen P. March_____
24 **KATHLEEN P. MARCH**

**U.S. Bankruptcy Court
Central District of California (Santa Ana)
Bankruptcy Petition #: 8:23-bk-10571-SC**

Assigned to: Scott C Clarkson
Chapter 11
Voluntary
Asset

Date filed: 03/20/2023
341 meeting: 04/24/2023
Deadline for objecting to discharge: 06/23/2023

Debtor
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ORANGE-CA
Tax ID / EIN: 83-3885343

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Trustee
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EXHIBIT A

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Creditor Committee**Committee of Unsecured Creditors**

c/o Fox Rothschild LLP
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represented by Nicholas A Koffroth

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Filing Date	#	Docket Text
05/01/2023	52 (3 pgs)	Amending Schedules (D) Filed by Debtor The Litigation Practice Group P.C.. (Khang, Joon) (Entered: 05/01/2023)
05/01/2023		Receipt of Amending Schedules D and/or E/F (Official Form 106D, 106E/F, 206D, or 206E/F) (Fee)(8:23-bk-10571-SC) [misc,amdsch] (32.00) Filing Fee. Receipt number A55409720. Fee amount 32.00. (re: Doc# 52) (U.S. Treasury) (Entered: 05/01/2023)
05/01/2023	53 (1 pg)	Schedule G Non-Individual: Executory Contracts and Unexpired Leases (Official Form 106G or 206G) Filed by Debtor The Litigation Practice Group P.C.. (Khang, Joon) (Entered: 05/01/2023)
05/01/2023	54 (18 pgs)	Statement of Financial Affairs for Non-Individual Filing for Bankruptcy (Official Form 107 or 207) <i>Amended</i> Filed by Debtor The Litigation Practice Group P.C.. (Khang, Joon) (Entered: 05/01/2023)
05/01/2023	55 (17 pgs)	Chapter 11 Monthly Operating Report for the Month Ending: 03/31/2023 Filed by Debtor The Litigation Practice Group P.C.. (Khang, Joon) (Entered: 05/01/2023)
05/02/2023	56 (10 pgs)	Objection (related document(s): 41 Notice filed by Debtor The Litigation Practice Group P.C.) <i>/Objection to Notice of Setting/Increasing Insider Compensation of Daniel March and Request for Hearing Thereon; Declaration of Marilyn Sorensen in Support Thereof; along with Proof of Service</i> Filed by U.S. Trustee United States Trustee (SA) (Ng, Queenie) (Entered: 05/02/2023)
05/03/2023	57 (4 pgs)	Objection (related document(s): 56 Objection filed by U.S. Trustee United States Trustee (SA)) <i>Joinder in Objection to Notice of Insider Compensation Filed by the Office of the United States Trustee</i> Filed by Creditors Debt Validation Fund II, LLC, MC DVI Fund 1, LLC, MC DVI Fund 2, LLC (Hollander, Garrick) (Entered: 05/03/2023)
05/03/2023	68	Hearing Held (RE: related document(s) 19 Motion for Relief from Stay - Unlawful Detainer RE: 17542 E. 17th Street, Suites 100, 105, 250 & 330, Tustin, CA 92780 filed by Creditor SDCO Tustin Executive Center, Inc.)

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		Motion Granted Pursuant to Sections 362(d)(1) and (d)(2) with 4001(a)(3) waiver. Extraordinary Relief Denied - Order by attorney. (JL) Modified on 5/18/2023 (NB8). (Entered: 05/09/2023)
05/03/2023	69	Hearing Held (RE: related document(s) 21 Motion By United States Trustee To Dismiss Or Convert Case Pursuant To 11 U.S.C. Section 1112(b) filed by U.S. Trustee United States Trustee (SA)) Motion Denied. Order by Attorney. (JL) Modified on 5/18/2023 (NB8). (Entered: 05/09/2023)
05/04/2023	58 (2 pgs)	Order Directing United States Trustee To Appoint Chapter 11 Trustee. IT IS ORDERED: The Motion Shall Be And Hereby Is GRANTED, As Set Forth Herein. The United States Trustee Is Directed To Appoint A Chapter 11 Trustee In This Case. (BNC-PDF) (Related Doc # 21) Signed on 5/4/2023 (NB8) (Entered: 05/04/2023)
05/04/2023	59 (3 pgs)	Order Granting Motion for relief from stay UNLAWFUL DETAINER To SDCO Tustin Executive Center, Inc. RE: 17542 E. 17th Street, Suites 100, 105, 250 And 330, Tustin, CA 92780 (Orange County) (BNC-PDF) (Related Doc # 19) Signed on 5/4/2023 (NB8) (Entered: 05/04/2023)
05/06/2023	60 (4 pgs)	BNC Certificate of Notice - PDF Document. (RE: related document(s) 58 Order on Generic Motion (BNC-PDF)) No. of Notices: 1. Notice Date 05/06/2023. (Admin.) (Entered: 05/06/2023)
05/06/2023	61 (5 pgs)	BNC Certificate of Notice - PDF Document. (RE: related document(s) 59 Motion for relief from stay UNLAWFUL DETAINER (BNC-PDF)) No. of Notices: 1. Notice Date 05/06/2023. (Admin.) (Entered: 05/06/2023)
05/08/2023	62 (3 pgs)	Notice of Appointment of Chapter 11 Trustee; along with Proof of Service Filed by U.S. Trustee United States Trustee (SA). (Ng, Queenie) (Entered: 05/08/2023)
05/08/2023	63 (3 pgs)	Notice /Acceptance of Appointment as Chapter 11 Trustee; along with Proof of Service Filed by U.S. Trustee United States Trustee (SA). (Ng, Queenie) (Entered: 05/08/2023)
05/08/2023	64 (7 pgs)	Application For Order Approving Appointment of Trustee and Fixing Bond; along with Proof of Service Filed by U.S. Trustee United States Trustee (SA) (Ng, Queenie) (Entered: 05/08/2023)
05/08/2023	65 (1 pg)	Order Approving the U.S. Trustee's Application for the Appointment of a Chapter 11 Trustee. Richard A. Marshack is appointed as the Chapter 11 Trustee in the above captioned case. (BNC-PDF) (Related Doc 64) Signed on 5/8/2023 (AM). Modified on 5/8/2023 (AM). (Entered: 05/08/2023)
05/09/2023	66 (1 pg)	Request for courtesy Notice of Electronic Filing (NEF) Filed by Hays, D. (Hays, D) (Entered: 05/09/2023)
05/09/2023	67 (1 pg)	Request for courtesy Notice of Electronic Filing (NEF) Filed by Masud, Laila. (Masud, Laila) (Entered: 05/09/2023)
05/10/2023	70 (3 pgs)	BNC Certificate of Notice - PDF Document. (RE: related document(s) 65 Order on Generic Application (BNC-PDF)) No. of Notices: 1. Notice Date 05/10/2023. (Admin.) (Entered: 05/10/2023)

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05/11/2023	71 (3 pgs)	Request for special notice <i>and Notice of Appearance</i> Filed by Creditor City Capital NY. (Hochheiser, Alan) (Entered: 05/11/2023)
05/15/2023	72 (3 pgs)	Voluntary Dismissal of Motion <i>Notice Of Withdrawal Of Notice Of Motion And Motion Of Debt Validation Fund II, LLC, MC DVI Fund 1, LLC, And MC DVI Fund 2, LLC To Dismiss Chapter 11 Case Pursuant To 11 U.S.C. §§ 105, 305, 349, & 1112, Or In The Alteranative Convert This Case To Chapter 7 Or Appoint A Trustee</i> Filed by Creditors Debt Validation Fund II, LLC, MC DVI Fund 1, LLC, MC DVI Fund 2, LLC (RE: related document(s) 44 Motion to Dismiss Debtor <i>Notice Of Motion And Motion By DVF And MC DVI To Dismiss Chapter 11 Case Pursuant To 11 U.S.C. Sections 105, 305, 349, & 1112, Or In The Alternative Convert This Case To Chapter 7 Or Appoint A Trustee</i>). (Hollander, Garrick) (Entered: 05/15/2023)
05/17/2023	73 (1 pg)	Request for courtesy Notice of Electronic Filing (NEF) Filed by Richards, Ronald. (Richards, Ronald) (Entered: 05/17/2023)
05/17/2023	74	Hearing Continued On Motion (RE: related document 44 Motion By DVF And MC DVI To Dismiss Chapter 11 Case Pursuant To 11 U.S.C. Sections 105, 305, 349, And 1112, Or In The Alternative Convert This Case To Chapter 7 Or Appoint A Trustee) - HEARING ON MOTION CONTINUED TO JUNE 14, 2023 AT 1:30 P.M. IN COURTROOM 5C, LOCATED AT 411 WEST FOURTH STREET, SANTA ANA, CA 92701. STATUS REPORT DUE (14) FOURTEEN DAYS IN ADVANCE, The case judge is Scott C Clarkson (NB8) (Entered: 05/19/2023)
05/19/2023	75 (23 pgs)	Notice of Motion and Motion in Individual Ch 11 Case for Order Employing Professional (LBR 2014-1): Marshack Hays LLP as General Counsel <i>Application by Chapter 11 Trustee to Employ Marshack Hays LLP as General Counsel; Memorandum of Points and Authorities; Declaration of D. Edward Hays in Support; with proof of service</i> Filed by Trustee Richard A Marshack (TR) (Hays, D) (Entered: 05/19/2023)
05/19/2023	76 (13 pgs)	Notice of motion/application Filed by Trustee Richard A Marshack (TR) (RE: related document(s) 75 Notice of Motion and Motion in Individual Ch 11 Case for Order Employing Professional (LBR 2014-1): Marshack Hays LLP as General Counsel <i>Application by Chapter 11 Trustee to Employ Marshack Hays LLP as General Counsel; Memorandum of Points and Authorities; Declaration of D. Edward Hays in Support; with proof of service</i> Filed by Trustee Richard A Marshack (TR)). (Hays, D) (Entered: 05/19/2023)
05/22/2023	77 (1 pg)	Request for courtesy Notice of Electronic Filing (NEF) Filed by Golubow, Richard. (Golubow, Richard) (Entered: 05/22/2023)
05/22/2023	78 (1 pg)	Request for courtesy Notice of Electronic Filing (NEF) Filed by Kupetz, David. (Kupetz, David) (Entered: 05/22/2023)
05/24/2023	79 (1 pg)	Request for special notice Filed by Creditor Jason Patterson Stopnitzky. (Chayo, Leslie) (Entered: 05/24/2023)
05/25/2023	93 (29 pgs)	Adversary case 8:23-ap-01046. Complaint by Plaintiff: Richard A. Marshack against Defendants: Tony Diab , Daniel S. March , Rosa Bianca Loli , Lisa Cohen , William Taylor Carss , Eng Tang , Maria Eeya Tan , Jake Akers , Han Trinh , Jayde Trinh , Wes Thomas , Scott James Eadie , Jimmy Chhor , Dongliang Jiang , Oakstone Law Group PC , Greyson Law

		Center PC , Phoenix Law Group, Inc. , Maverick Management, LLC , LGS Holdco, LLC , Consumer Legal Group, PC , Vulcan Consulting Group LLC , B.A.T. Inc. , Prime Logix, LLC , Teracel Blockchain Fund II LLC , EPPS , Equipay , Authorize Net , World Global , Optimumbank Holdings, Inc. , Marich Bein, LLC , BankUnited, N.A. , Revolv3, Inc. , Fidelity National Information Services, Inc. , Worldpay, Inc. , Worldpay Group , Merit Fund, LLC , Guardian , The United States Postal Service . Fee Amount \$350 Nature of Suit: (72 (Injunctive relief - other)) ,(13 (Recovery of money/property - 548 fraudulent transfer)) ,(11 (Recovery of money/property - 542 turnover of property)) (VN) (Entered: 06/08/2023)
05/31/2023	80 (1 pg)	Request for courtesy Notice of Electronic Filing (NEF) Filed by Lieberman, Michael. (Lieberman, Michael) (Entered: 05/31/2023)
05/31/2023	81 (4 pgs)	Status Report for Chapter 11 Status Conference <i>with Proof of Service</i> Filed by Trustee Richard A Marshack (TR). (Hays, D) (Entered: 05/31/2023)
06/05/2023	82 (1 pg)	Notice of Change of Address of Ronald W. Moore. Filed by Creditor Ronald W. Moore. [EDB] (VN) (Entered: 06/05/2023)
06/06/2023	83 (1 pg)	Amended Notice of Change of Address (Zip Code) of Ronald W Moore. Filed by Creditor Ronald W. Moore. [EDB](VN) (Entered: 06/06/2023)
06/06/2023	84 (1 pg)	Request for courtesy Notice of Electronic Filing (NEF) Filed by Salvato, Gregory. (Salvato, Gregory) (Entered: 06/06/2023)
06/06/2023	85 (1 pg)	Request for courtesy Notice of Electronic Filing (NEF) Filed by Miskin, Kenneth. (Miskin, Kenneth) (Entered: 06/06/2023)
06/07/2023	86 (17 pgs)	Application to Employ Bicher & Associates as Field Agent and Forensic Analyst <i>and Declaration in support; with Proof of Service</i> Filed by Trustee Richard A Marshack (TR) (Marshack (TR), Richard) (Entered: 06/07/2023)
06/07/2023	87 (7 pgs)	Notice of Opportunity To Request a Hearing On Motion (LBR 9013-1(o)) <i>with Proof of Service</i> Filed by Trustee Richard A Marshack (TR) (RE: related document(s) 86 Application to Employ Bicher & Associates as Field Agent and Forensic Analyst <i>and Declaration in support; with Proof of Service</i> Filed by Trustee Richard A Marshack (TR) (Marshack (TR), Richard)). (Marshack (TR), Richard) (Entered: 06/07/2023)
06/07/2023	88 (2 pgs)	Order Advancing Status Conference To Be Heard Concurrently With Related Matters And Requiring Notice. IT IS ORDERED: The Court Hereby ORDERS That The Status Conference Be ADVANCED To JUNE 12, 2023, AT 1:30 P.M. To Be Heard Concurrently With Matters In Related Adversary Proceedings, And That The Chapter 11 Trustee Serve A Copy Of This Order To The Noticed Parties Within 24 Hours Of Entry Of This Order. (BNC-PDF) (Related Doc # 14) Signed on 6/7/2023 (NB8) (Entered: 06/07/2023)
06/07/2023	89 (9 pgs)	Proof of service Filed by Trustee Richard A Marshack (TR) (RE: related document(s) 88 ORDER to continue/reschedule hearing (BNC-PDF)). (Hays, D) (Entered: 06/07/2023)
06/07/2023	90 (42 pgs; 2 docs)	Application to Employ Dinsmore & Shohl LLP as Special Counsel to Chapter 11 Trustee Filed by Trustee Richard A Marshack (TR)

		(Attachments: # 1 Declaration of Christopher Celentino) (Celentino, Christopher) (Entered: 06/07/2023)
06/07/2023	91 (6 pgs)	Notice Of Filing Application Pursuant To 11 U.S.C. Section 327(a) Authorizing The Retention And Employment Of Dinsmore & Shohl LLP As Special Counsel For Chapter 11 Trustee Richard A. Marshack And Opportunity To Request A Hearing Filed by Trustee Richard A Marshack (TR) (RE: related document(s) 90 Application to Employ Dinsmore & Shohl LLP as Special Counsel to Chapter 11 Trustee Filed by Trustee Richard A Marshack (TR) (Attachments: # 1 Declaration of Christopher Celentino)). (Celentino, Christopher) (Entered: 06/07/2023)
06/07/2023	92 (6 pgs)	Statement Of Disinterestedness For Employment Of Professional Person Under FRBP 2014 Filed by Trustee Richard A Marshack (TR). (Celentino, Christopher) (Entered: 06/07/2023)
06/08/2023	94 (9 pgs)	Proof of service Supplemental Proof of Service Filed by Trustee Richard A Marshack (TR) (RE: related document(s) 91 Notice). (Celentino, Christopher) (Entered: 06/08/2023)
06/09/2023	95 (20 pgs)	Application to Employ Grobstein Teeple LLP as Accountant Notice of Application and Application of Chapter 11 Trustee, Richard A. Marshack, for Authorization to Employ Grobstein Teeple LLP as Accountants Effective May 12, 2023; Statement of Disinterestedness; Proof of Service; Exhibits A-B Filed by Accountant Grobstein Teeple LLP. (Teeple, Joshua) (Entered: 06/09/2023)
06/09/2023	96 (1 pg)	Request for courtesy Notice of Electronic Filing (NEF) Filed by Still, Andrew. (Still, Andrew) (Entered: 06/09/2023)
06/09/2023	97 (4 pgs)	BNC Certificate of Notice - PDF Document. (RE: related document(s) 88 ORDER to continue/reschedule hearing (BNC-PDF)) No. of Notices: 1. Notice Date 06/09/2023. (Admin.) (Entered: 06/09/2023)
06/12/2023	98	Hearing Continued On Status Conference (RE: related document 14 - Status Conference RE: (1) Case Management Conference And (2) Requiring Status Report) - STATUS CONFERENCE HEARING CONTINUED TO JULY 19, 2023 AT 1:30 P.M. IN COURTROOM 5C, LOCATED AT 411 WEST FOURTH STREET, SANTA ANA, CA 92701. STATUS REPORT DUE FOURTEEN (14) DAYS IN ADVANCE. The case judge is Scott C Clarkson (NB8) (Entered: 06/13/2023)
06/13/2023	99 (70 pgs)	Transcript regarding Hearing Held 05/25/23 RE: HEARING RE: EMERGENCY MOTION. Remote electronic access to the transcript is restricted until 09/11/2023. The transcript may be viewed at the Bankruptcy Court Clerk's Office on a public terminal or purchased through the Transcription Service Provider before the transcript access restriction has ended. [TRANSCRIPTION SERVICE PROVIDER: BRIGGS REPORTING COMPANY, INC., Telephone number 310-410-4151.]. Notice of Intent to Request Redaction Deadline Due By 6/20/2023. Redaction Request Due By 07/5/2023. Redacted Transcript Submission Due By 07/14/2023. Transcript access will be restricted through 09/11/2023. (Steinhauer, Holly) (Entered: 06/13/2023)
06/13/2023	100 (1 pg)	Request for courtesy Notice of Electronic Filing (NEF) Filed by Langley, Christopher. (Langley, Christopher) (Entered: 06/13/2023)

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06/13/2023	101 (1 pg)	Request for courtesy Notice of Electronic Filing (NEF) Filed by Bensamochan, Eric. (Bensamochan, Eric) (Entered: 06/13/2023)
06/13/2023	102 (25 pgs)	Emergency motion <i>Notice of Emergency Motion and Emergency Motion for Order Authorizing the Chapter 11 Trustee to Enter Into an Expense Reimbursement Agreement with the Ad Hoc Committee; with Proof of Service</i> Filed by Trustee Richard A Marshack (TR) (Hays, D) - [ORDER SHORTENING TIME GRANTED 6-13-2023. HEARING ON MOTION SET FOR JUNE 28, 2023 AT 11:00 A.M. IN COURTROOM 5C - ATTORNEY TO GIVE NOTICE] Modified on 6/14/2023 (NB8). (Entered: 06/13/2023)
06/13/2023	103 (15 pgs)	Application shortening time Filed by Trustee Richard A Marshack (TR) (Hays, D) (Entered: 06/13/2023)
06/13/2023	104 (1 pg)	Order Continuing Status Conference. IT IS ORDERED: The Status Conference Is Hereby CONTINUED TO JULY 19, 2023, AT 1:30 P.M. In Courtroom 5C, Located At 411 West Fourth Street, Santa Ana, CA 92701. A Status Report By The Chapter 11 Trustee Is Due 14 Days In Advance. The Chapter 11 Trustee Is To Provide Notice Of The Status Conference To All Creditors And File A Proof Of Service Within Seventy-Two Hours Of Entry Of This Order. (BNC-PDF) (Related Doc # 14) Signed on 6/13/2023 (NB8) (Entered: 06/13/2023)
06/13/2023	105 (4 pgs)	Order Granting Application And Setting Hearing On Shortened Notice. The Hearing On The Notice Of Emergency Motion And Emergency Motion For Order Authorizing The Chapter 11 Trustee To Enter Into An Expense Reimbursement Agreement With Ad Hoc Committee Will Take Place On June 28, 2023 At 11:00 A.M. In Courtroom 5C, Located At 411 West Fourth Street, Santa Ana, CA 92701. (BNC-PDF) (Related Doc # 103) Signed on 6/13/2023 (NB8) (Entered: 06/13/2023)
06/13/2023	106	Hearing Set (RE: related document(s) 102 Emergency Motion For Order Authorizing The Chapter 11 Trustee To Enter Into An Expense Reimbursement Agreement With The Ad Hoc Committee filed by Trustee Richard A Marshack (TR)) The Hearing date is set for 6/28/2023 at 11:00 AM at Crtrm 5C, 411 W Fourth St., Santa Ana, CA 92701. The case judge is Scott C Clarkson (NB8) (Entered: 06/13/2023)
06/14/2023	107 (1 pg)	Request for courtesy Notice of Electronic Filing (NEF) Filed by Shankman, Paul. (Shankman, Paul) (Entered: 06/14/2023)
06/14/2023	108 (17 pgs)	Notice of Hearing Filed by Trustee Richard A Marshack (TR) (RE: related document(s) 102 Emergency motion <i>Notice of Emergency Motion and Emergency Motion for Order Authorizing the Chapter 11 Trustee to Enter Into an Expense Reimbursement Agreement with the Ad Hoc Committee; with Proof of Service</i> Filed by Trustee Richard A Marshack (TR) (Hays, D) - [ORDER SHORTENING TIME GRANTED 6-13-2023. HEARING ON MOTION SET FOR JUNE 28, 2023 AT 11:00 A.M. IN COURTROOM 5C - ATTORNEY TO GIVE NOTICE] Modified on 6/14/2023 (NB8).). (Masud, Laila) (Entered: 06/14/2023)
06/14/2023	109 (1 pg)	Request for courtesy Notice of Electronic Filing (NEF) Filed by Kharasch, Ira. (Kharasch, Ira) (Entered: 06/14/2023)
06/14/2023	110	Request for courtesy Notice of Electronic Filing (NEF) Filed by Newmark,

	(1 pg)	Main Document (Newmark, Victoria) (Entered: 06/14/2023)
06/14/2023	132	Hearing Advanced On Status Conference (RE: related document 14 Status Conference RE: (1) Case Management Conference And (2) Requiring Status Report) - STATUS CONFERENCE HEARING ADVANCED TO JUNE 12, 2023 AT 1:30 P.M. IN COURTROOM 5C, LOCATED AT 411 WEST FOURTH STREET, SANTA ANA, CA 92701PER ORDER ADVANCING STATUS CONFERENCE TO BE HEARD CONCURRENTLY WITH RELATED MATTERS AND REQUIRING NOTICE ENTERED 6-7-2023 - (DOCKET NO. 88) (NB8) (Entered: 06/22/2023)
06/15/2023	111 (12 pgs)	Errata Filed by Trustee Richard A Marshack (TR) (RE: related document(s) 102 Emergency motion <i>Notice of Emergency Motion and Emergency Motion for Order Authorizing the Chapter 11 Trustee to Enter Into an Expense Reimbursement Agreement with the Ad Hoc Committee; with Proof of Service</i>). (Hays, D) (Entered: 06/15/2023)
06/15/2023	112 (4 pgs)	Declaration re: <i>Declaration of Trustee in Lieu of filing Monthly Operating Reports for April and May 2023 at this time; with Proof of Service</i> Filed by Trustee Richard A Marshack (TR). (Marshack (TR), Richard) (Entered: 06/15/2023)
06/15/2023	113 (1 pg)	Request for courtesy Notice of Electronic Filing (NEF) Filed by White, Johnny. (White, Johnny) (Entered: 06/15/2023)
06/15/2023	114 (4 pgs)	BNC Certificate of Notice - PDF Document. (RE: related document(s) 104 ORDER to continue/reschedule hearing (BNC-PDF)) No. of Notices: 1. Notice Date 06/15/2023. (Admin.) (Entered: 06/15/2023)
06/15/2023	115 (7 pgs)	BNC Certificate of Notice - PDF Document. (RE: related document(s) 105 ORDER shortening time (BNC-PDF)) No. of Notices: 1. Notice Date 06/15/2023. (Admin.) (Entered: 06/15/2023)
06/16/2023	116 (1 pg)	Transcript Order Form, regarding Hearing Date 06/12/23 Filed by Attorney Teri Pham. (Pham, Teri) ORDER NOT PROCESSED. Ordering Party to Contact Briggs Reporting for a Copy of the Transcript. Transcript was ordered in the adversary case in 8:23-AP-10146-SC. Modified on 6/20/2023 (JL). (Entered: 06/16/2023)
06/16/2023	117 (1 pg)	Request for courtesy Notice of Electronic Filing (NEF) Filed by Lev, Daniel. (Lev, Daniel) (Entered: 06/16/2023)
06/16/2023	118 (1 pg)	Request for courtesy Notice of Electronic Filing (NEF) Filed by Clark, Randall. (Clark, Randall) (Entered: 06/16/2023)
06/16/2023	119 (38 pgs; 6 docs)	Motion to Borrow <i>Trustees Notice of Motion and Emergency Motion (I) for Entry of Interim Order: (A) Authorizing the Trustee to Obtain Post-Petition Financing and Superpriority Administrative Expense Claim Pursuant to 11 U.S.C. § 364; and (B) Setting Final Hearing; and Pursuant to Final Hearing, (II) for Entry of Final Order Approving Post-Petition Financing on a Final Basis; Memorandum of Points and Authorities; Declaration of Richard A. Marshack in Support Thereof; and Exhibits</i> Filed by Trustee Richard A Marshack (TR) (Attachments: # 1 Affidavit Declaration of Richard A. Marshack # 2 Exhibit Exhibit 1: Proposed Interim Order Granting Emergency Superpriority Financing by the Chapter 11 Trustee # 3 Exhibit Exhibit 2: Super-Priority Promissory Note # 4

06/16/2023	122	Hearing Set (RE: related document(s) 119 Trustee's Motion (I) For Entry Of Interim Order: (A) Authorizing The Trustee To Obtain Post-Petitioning Financing And Superpriority Administrative Expense Claim Pursuant To 11 U.S.C. Section 364; And (B) Setting Final Hearing; And Pursuant To Final Hearing, (II) For Entry Of Final Order Approving Post-Petition Financing On A Final Basis filed by Trustee Richard A Marshack (TR)) The Hearing date is set for 6/20/2023 at 03:00 PM at Crtrm 5C, 411 W Fourth St., Santa Ana, CA 92701. The case judge is Scott C Clarkson (NB8) (Entered: 06/20/2023)
06/17/2023	120 (4 pgs)	Statement <i>Statement Regarding Cash Collateral or Debtor in Possession Financing [FRBP 4001; LBR 4001-2]</i> Filed by Trustee Richard A Marshack (TR). (Serrano, Jonathan) (Entered: 06/17/2023)
06/20/2023	121 (1 pg)	Request for courtesy Notice of Electronic Filing (NEF) Filed by Skorheim, Leslie. (Skorheim, Leslie) (Entered: 06/20/2023)
06/20/2023	123 (8 pgs)	Declaration re: <i>of Chapter 11 Trustee's Counsel Regarding Proof of Notice of Hearing and Service of Emergency Financing Motion</i> Filed by Trustee Richard A Marshack (TR) (RE: related document(s) 119 Motion to Borrow Trustees Notice of Motion and Emergency Motion (I) for Entry of Interim Order: (A) Authorizing the Trustee to Obtain Post-Petition Financing and Superpriority Administrative Expense Claim Pursuant to 11 U.S.C. § 364; and (B) Set). (Serrano, Jonathan) (Entered: 06/20/2023)
06/20/2023	124 (6 pgs)	Notice of Appearance and Request for Notice , <i>with proof of service</i> by Olivia Scott Filed by Creditors Azzure Capital LLC, Hi Bar Capital LLC. (Scott, Olivia) (Entered: 06/20/2023)
06/20/2023	125	Hearing Held On Motion (RE: related document(s) 119 Trustee's Emergency Motion (I) For Entry Of Interim Order: (A) Authorizing The Trustee To Obtain Post-Petition Financing And Superpriority Administrative Expense Claim Pursuant To 11 U.S.C. Section 364; And (B) Setting Final Hearing; And Pursuant To Final Hearing, (II) For Entry Of Final Order Approving Post-Petition Financing On A Final Basis filed by Trustee Richard A Marshack (TR)) - ORDER BY ATTORNEY - MOTION GRANTED (NB8) (Entered: 06/20/2023)
06/21/2023	126 (41 pgs)	Declaration That No Party Requested a Hearing on Motion (LBR 9013-1(o)(3)) Filed by Trustee Richard A Marshack (TR) (RE: related document(s) 75 Notice of Motion and Motion in Individual Ch 11 Case for Order Employing Professional (LBR 2014-1): Marshack Hays LLP as General Counsel <i>Application by Chapter 11 Trustee to Employ Marshack Hays LLP as General Counsel; Memorandum of Points and Author</i>). (Masud, Laila) (Entered: 06/21/2023)
06/22/2023	127 (12 pgs)	Objection (related document(s): 102 Emergency motion <i>Notice of Emergency Motion and Emergency Motion for Order Authorizing the Chapter 11 Trustee to Enter Into an Expense Reimbursement Agreement with the Ad Hoc Committee; with Proof of Service</i> filed by Trustee Richard A Marshack (TR)) <i>United States Trustees Opposition To Emergency Motion Authorizing The Chapter 11 Trustee To Enter Into An Expense Reimbursement Agreement With The Ad Hoc Committee</i> Filed by U.S.

06/22/2023	128 (2 pgs)	Sua Sponte Request For Status Reports To Be Filed By (1) The Chapter 11 Trustee And (2) The United States Trustee By 5:00 P.M. Pacific Time, On June 23, 2023. IT IS ORDERED: By This Order, The Court Respectfully Requests That Trustees Prepare Brief Individual Status Reports On The Following Matters: 1. Understanding That The Chapter 11 Trustee Is Receiving Information On The Case On A Day-By Day, Perhaps Hour-By-Hour, Basis, The Chapter 11 Trustee Is To Provide A Report Updating The Information Contained In The Complaint (Docket 93 Of The Main Case). In Particular, The General Allegations Contained In Section B, Paragraphs 44 Through 47 (LPG's Ownership And Management) And Section C, Paragraphs 48 Through 52 (LPG's Business Structure, (Inclusive, Should Be Updated. 2. The United States Trustee Is To Report Its Intentions To Appoint A Committee To Represent The Interests Of The Clients/Customers Of The Debtor. (BNC-PDF) (Related Doc # 1) Signed on 6/22/2023 (NB8) (Entered: 06/22/2023)
06/22/2023	129 (2 pgs)	Order Granting Application By Chapter 11 Trustee To Employ Marshack Hays LLP As General Counsel. IT IS ORDERED: The Application Is APPROVED. Trustee Is Authorized To Employ The Firm As His General Counsel Pursuant To 11 U.S.C. Section 327 At The Firm's Hourly Rates With Any Compensation And Reimbursement Of Costs To Be Paid By The Estate Only Upon Application To And Approval By The Court Pursuant To 11 U.S.C. Sections 330 And 331. In The Event The Underlying Bankruptcy Case Is Converted To A Chapter 7, There Is No Need For Firm To Seek To Be Re-Employed In The Converted Case. (BNC-PDF) Marshack Hays LLP (Related Doc # 75) Signed on 6/22/2023. (NB8) (Entered: 06/22/2023)
06/22/2023	130 (8 pgs)	Notice of lodgment <i>Notice of Lodgment of Order re Trustee's Notice of Motion and Emergency Motion (I) for Entry of Interim Order: (A) Authorizing The Trustee to Obtain Post-Petition Financing and Superpriority Administrative Expense Claim Pursuant to 11 U.S.C. § 364; and (B) Setting Final Hearing; and Pursuant to Final Hearing, (II) for Entry of Final Order Approving Post-Petition Financing on a Final Basis</i> Filed by Trustee Richard A Marshack (TR) (RE: related document(s) 119 Motion to Borrow <i>Trustees Notice of Motion and Emergency Motion (I) for Entry of Interim Order: (A) Authorizing the Trustee to Obtain Post-Petition Financing and Superpriority Administrative Expense Claim Pursuant to 11 U.S.C. § 364; and (B) Setting Final Hearing; and Pursuant to Final Hearing, (II) for Entry of Final Order Approving Post-Petition Financing on a Final Basis; Memorandum of Points and Authorities; Declaration of Richard A. Marshack in Support Thereof; and Exhibits</i> Filed by Trustee Richard A Marshack (TR) (Attachments: # 1 Affidavit Declaration of Richard A. Marshack # 2 Exhibit Exhibit 1: Proposed Interim Order Granting Emergency Superpriority Financing by the Chapter 11 Trustee # 3 Exhibit Exhibit 2: Super-Priority Promissory Note # 4 Exhibit Exhibit 3: UCC Search # 5 Proof of Service)). (Serrano, Jonathan) (Entered: 06/22/2023)
06/22/2023	131 (4 pgs)	Interim Order Granting Emergency Superpriority Financing By The Chapter 11 Trustee. IT IS ORDERED: The Court GRANTS The Motion. APPROVES The Terms Of That Certain Super-Priority Promissory Note (The "Note") As Attached As Exhibit 2 To The Trustee's Declaration. Authorizes The Trustee To Borrow, And The Lender (As Defined In The Motion) To Advance Up To \$800,000 In The Aggregate, Including An Initial Advance In The Amount Of \$350,000 And A Subsequent Advance

		<p>Principal of \$450,000, At An Interest Rate Of 8% Per Annum, With The Full Balance, Including All Accrued Interest, Due And Payable In One Year From The Start Date (As Defined In The Note), With Payments First Credited To Interest Due And Any Remainder Credited To Principal, As Provided Under The Note, Subject To The Terms Of This Order. Sets A Final Hearing On The Motion For July 20, 2023 At 9:30 A.M. In Courtroom 5C, Located At 41 West Fourth Street, Santa Ana, CA 92701. (SEE ORDER FOR FURTHER RULING) (BNC-PDF) (Related Doc # 119) Signed on 6/22/2023 (NB8) (Entered: 06/22/2023)</p>
06/23/2023	133 (5 pgs)	<p>Notice of Billing Rates re Trustee's Emergency Motion re Expense Reimbursement Agreement Filed by Interested Party Ad Hoc Consumer Claimants Committee (RE: related document(s) 102 Emergency motion Notice of Emergency Motion and Emergency Motion for Order Authorizing the Chapter 11 Trustee to Enter Into an Expense Reimbursement Agreement with the Ad Hoc Committee; with Proof of Service Filed by Trustee Richard A Marshack (TR) (Hays, D) - [ORDER SHORTENING TIME GRANTED 6-13-2023. HEARING ON MOTION SET FOR JUNE 28, 2023 AT 11:00 A.M. IN COURTROOM 5C - ATTORNEY TO GIVE NOTICE] Modified on 6/14/2023 (NB8). (Kharasch, Ira) (Entered: 06/23/2023)</p>
06/23/2023	134 (3 pgs)	<p>Unsecured creditors' committee appointed <i>Appointment and Notice of Appointment of Official Committee of Unsecured Creditors by United States Trustee</i> Filed by U.S. Trustee United States Trustee (SA). (Skorheim, Leslie) (Entered: 06/23/2023)</p>
06/23/2023	135 (5 pgs)	<p>Status report <i>United States Trustee's Status Report in Response to the Court's Sua Sponte Request</i> Filed by U.S. Trustee United States Trustee (SA) (RE: related document(s) 128 Order (Generic) (BNC-PDF)). (Skorheim, Leslie) - See docket entry no.: 138 for corrections - Modified on 6/23/2023 (NB8). (Entered: 06/23/2023)</p>
06/23/2023	136 (1 pg)	<p>Request for courtesy Notice of Electronic Filing (NEF) Filed by Cohen, Leslie. (Cohen, Leslie) (Entered: 06/23/2023)</p>
06/23/2023	137 (10 pgs)	<p>Declaration re: <i>Supplemental Declaration of Joon M Khang in Support of Application to Employ Khang & Khang LLP</i> Filed by Debtor The Litigation Practice Group P.C. (RE: related document(s) 42 Application to Employ KHANG & KHANG LLP as DEBTOR'S GENERAL BANKRUPTCY COUNSEL). (Khang, Joon) (Entered: 06/23/2023)</p>
06/23/2023	138	<p>Notice to Filer of Error and/or Deficient Document Document filed without electronic /s/ or holographic signature. THE FILER IS INSTRUCTED TO RE-FILE THE DOCUMENT WITH THE PROPER SIGNATURES. (RE: related document(s) 135 Status report filed by U.S. Trustee United States Trustee (SA)) (NB8) (Entered: 06/23/2023)</p>
06/23/2023	139 (5 pgs)	<p>Status report <i>United States Trustee's Status Report in Response to the Court's Sua Sponte Request - corrected to add signature</i> Filed by U.S. Trustee United States Trustee (SA) (RE: related document(s) 128 Order (Generic) (BNC-PDF)). (Skorheim, Leslie) (Entered: 06/23/2023)</p>
06/24/2023	140 (5 pgs)	<p>BNC Certificate of Notice - PDF Document. (RE: related document(s) 128 Order (Generic) (BNC-PDF)) No. of Notices: 1. Notice Date 06/24/2023. (Admin.) (Entered: 06/24/2023)</p>

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06/24/2023	141 (5 pgs)	BNC Certificate of Notice - PDF Document. (RE: related document(s) 129 Order on Motion For Order Employing Professional (Ch 11)-(LBR 2014-1) (BNC-PDF)) No. of Notices: 1. Notice Date 06/24/2023. (Admin.) (Entered: 06/24/2023)
06/24/2023	142 (7 pgs)	BNC Certificate of Notice - PDF Document. (RE: related document(s) 131 Order on Motion to Borrow (BNC-PDF)) No. of Notices: 1. Notice Date 06/24/2023. (Admin.) (Entered: 06/24/2023)
06/26/2023	143 (20 pgs)	Notice of Hearing Filed by Trustee Richard A Marshack (TR). (Serrano, Jonathan) (Entered: 06/26/2023)
06/26/2023	144 (103 pgs)	Objection (related document(s): 102 Emergency motion <i>Notice of Emergency Motion and Emergency Motion for Order Authorizing the Chapter 11 Trustee to Enter Into an Expense Reimbursement Agreement with the Ad Hoc Committee; with Proof of Service</i> filed by Trustee Richard A Marshack (TR)) Filed by Creditor Carolyn Beech (Langley, Christopher) (Entered: 06/26/2023)
06/26/2023	145 (49 pgs)	Declaration That No Party Requested a Hearing on Motion (LBR 9013-1(o)(3)) Filed by Trustee Richard A Marshack (TR) (RE: related document(s) 90 Application to Employ Dinsmore & Shohl LLP as Special Counsel to Chapter 11 Trustee). (Ghio, Christopher) (Entered: 06/26/2023)
06/26/2023	146 (7 pgs)	Notice of lodgment of <i>Order</i> Filed by Trustee Richard A Marshack (TR) (RE: related document(s) 90 Application to Employ Dinsmore & Shohl LLP as Special Counsel to Chapter 11 Trustee). (Ghio, Christopher) (Entered: 06/26/2023)
06/26/2023	147 (7 pgs)	Application Of Non-Resident Attorney To Appear In A Specific Case Per Local Bankruptcy Rule [LBR- 2090-1(b)] Filed by Daniel A. Edelman (NB8) (Entered: 06/26/2023)
06/26/2023	148 (1 pg)	Order On Application Of Non-Resident Attorney To Appear In A Specific Case [LBR 2090-1(b)] IT IS ORDERED: The Application Is GRANTED And The Following Person May Appear As Requested In The Above-Entitled Case: Daniel A. Edelman. (BNC-PDF) Signed on 6/26/2023 (RE: related document(s) 147 Application of non-resident attorney to appear in a specific case). (NB8) (Entered: 06/26/2023)
06/26/2023	149 (6 pgs)	Stipulation By Richard A Marshack (TR) and <i>Office of the United States Trustee and Creditor Carolyn Beech for Dismissal of Emergency Motion for Order Authorizing the Chapter 11 Trustee to Enter Into An Expense Agreement with the Ad Hoc Committee [Re: Dk 102]; with Proof of Service</i> Filed by Trustee Richard A Marshack (TR) (Hays, D) (Entered: 06/26/2023)
06/27/2023	150 (269 pgs)	Transcript regarding Hearing Held 06/12/23 RE: HEARING RE: PRELIMINARY INJUNCTION STATUS CONFERENCE HEARING RE: (1) CASE MANAGEMENT CONFERENCE AND (2) REQUIRING STATUS REPORT. Remote electronic access to the transcript is restricted until 09/25/2023. The transcript may be viewed at the Bankruptcy Court Clerk's Office on a public terminal or purchased through the Transcription Service Provider before the transcript access restriction has ended. [TRANSCRIPTION SERVICE PROVIDER: BRIGGS REPORTING COMPANY, INC., Telephone number 310-410-4151.]. Notice of Intent to

06/27/2023	151 (2 pgs)	Order Approving Stipulation For Dismissal Of Emergency Motion For Order Authorizing The Chapter 11 Trustee To Enter Into An Expense Reimbursement Agreement With The Ad Hoc Committee. IT IS ORDERED: The Stipulation Is APPROVED In Its Entirety. The Motion Is DISMISSED Under FRCP 41(a)(1)(A) (ii) And LBR 9013-1(k). The Hearing On The Motion Scheduled For June 28, 2023, At 11:00 A.M., Is OFF CALENDAR Without The Need For Appearances. (BNC-PDF) (Related Doc # 149) Signed on 6/27/2023 (NB8) (Entered: 06/27/2023)
06/28/2023	152 (30 pgs)	Declaration That No Party Requested a Hearing on Motion (LBR 9013-1(o)(3)) <i>with Proof of Service</i> Filed by Trustee Richard A Marshack (TR) (RE: related document(s) 86 Application to Employ Bicher & Associates as Field Agent and Forensic Analyst <i>and Declaration in support; with Proof of Service</i>). (Marshack (TR), Richard) (Entered: 06/28/2023)
06/28/2023	153 (4 pgs)	BNC Certificate of Notice - PDF Document. (RE: related document(s) 148 ORDER on application of non-resident attorney to appear in a specific case per Local Bankruptcy rule (BNC-PDF)) No. of Notices: 1. Notice Date 06/28/2023. (Admin.) (Entered: 06/28/2023)
06/28/2023	227	Hearing Held On Motion (RE: related document(s) 102 Emergency Motion For Order Authorizing The Chapter 11 Trustee To Enter Into An Expense Reimbursement Agreement With The Ad Hoc Committee filed by Trustee Richard A Marshack (TR)) - HEARING ON MOTION OFF CALENDAR PER ORDER APPROVING STIPULATION FOR DISMISSAL OF EMERGENCY MOTION FOR ORDER AUTHORIZING THE CHAPTER 11 TRUSTEE TO ENTER INTO AN EXPENSE REIMBURSEMENT AGREEMENT WITH THE AD HOC COMMITTEE ENTERED 6-27-2023 - (DOCKET NO. 151) (NB8) (Entered: 07/12/2023)
06/29/2023	154 (1 pg)	Request for courtesy Notice of Electronic Filing (NEF) Filed by Golden, Jeffrey. (Golden, Jeffrey) (Entered: 06/29/2023)
06/29/2023	155 (1 pg)	Order Granting Trustee's Application to Employ Bicher & Associates as Field Agent and Forensic Analyst (BNC-PDF) (Related Doc # 86) Signed on 6/29/2023. (JL) (Entered: 06/29/2023)
06/29/2023	156 (21 pgs)	Notice <i>Trustees Ex Parte Notice of Non-Material Modification to Promissory Note With Additional Lender as Part of Previously Approved Post-Petition Financing and Request for Approval of Same; Declaration of Richard A. Marshack in Support Thereof; and Exhibits</i> Filed by Trustee Richard A Marshack (TR) (RE: related document(s) 131 Interim Order Granting Emergency Superpriority Financing By The Chapter 11 Trustee. IT IS ORDERED: The Court GRANTS The Motion. APPROVES The Terms Of That Certain Super-Priority Promissory Note (The "Note") As Attached As Exhibit 2 To The Trustee's Declaration. Authorizes The Trustee To Borrow, And The Lender (As Defined In The Motion) To Advance Up To \$800,000 In The Aggregate, Including An Initial Advance In The Amount Of \$350,000 And A Subsequent Advance Of Up To \$450,000, At An Interest Rate Of 8% Per Annum, With The Full Balance, Including All Accrued Interest, Due And Payable In One Year From The Start Date (As Defined In The Note), With Payments First Credited To Interest Due And Any Remainder Credited To Principal, As Provided Under The Note, Subject To The Terms Of This Order. Sets A Final Hearing On The Motion For July 20, 2023 At 9:30 A.M. In Courtroom 5C,

		located At 41 West Fourth Street, Santa Ana, CA 92701. (SEE ORDER FOR FURTHER RULING) (BNC-PDF) (Related Doc # 119) Signed on 6/22/2023 (NB8)). (Ghio, Christopher) (Entered: 06/29/2023)
06/29/2023	157 (3 pgs)	Unsecured creditors' committee appointed <i>Amended Appointment and Notice of Appointment of Official Committee of Unsecured Creditors by United States Trustee</i> Filed by U.S. Trustee United States Trustee (SA). (Skorheim, Leslie) (Entered: 06/29/2023)
06/29/2023	158 (2 pgs)	Order Setting Trustee's Ex Parte Notice Of Non-Material Modification To Promissory Note With Additional Lender As Part Of Previously Approved Post-Petition Financing And Request For Approval Of Same (Docket 156 For Hearing And Requiring Notice. IT IS ORDERED: The Court Sets The Motion For Hearing On June 30, 2023, AT 12:30 P.M. Movant Is Required To Provide Notice Of The Hearing By Not Later Than 6:00 P.M. On June 29, 2023, To Debtor, The United States Trustee, All Creditors And Any Other Interested Parties. Opposition, If Any, May Be Raised At The Hearing. (BNC-PDF) (Related Doc # 156) Signed on 6/29/2023 (NB8) (Entered: 06/29/2023)
06/29/2023	159	Hearing Set (RE: related document 156 Order Setting Trustee's Ex Parte Notice Of Non-Material Modification To Promissory Note With Additional Lender As Part Of Previously Approved Post-Petition Financing And Request For Approval Of Same (Docket 156 For Hearing And Requiring Notice. The Hearing date is set for 6/30/2023 at 12:30 PM at Crtrm 5C, 411 W Fourth St., Santa Ana, CA 92701. The case judge is Scott C Clarkson (NB8) (Entered: 06/29/2023)
06/29/2023	160 (9 pgs)	<i>Notice of Order Setting Trustees Ex Parte Notice of Non-Material Modification to Promissory Note With Additional Lender as Part of Previously Approved Post-Petition Financing and Request For Approval of Same [Dk.156] for Hearing and Requiring Notice</i> Filed by Trustee Richard A Marshack (TR) (RE: related document(s) 156 <i>Notice Trustees Ex Parte Notice of Non-Material Modification to Promissory Note With Additional Lender as Part of Previously Approved Post-Petition Financing and Request for Approval of Same; Declaration of Richard A. Marshack in Support Thereof; and Exhibits</i> Filed by Trustee Richard A Marshack (TR) (RE: related document(s) 131 <i>Interim Order Granting Emergency Superpriority Financing By The Chapter 11 Trustee. IT IS ORDERED: The Court GRANTS The Motion. APPROVES The Terms Of That Certain Super-Priority Promissory Note (The "Note") As Attached As Exhibit 2 To The Trustee's Declaration. Authorizes The Trustee To Borrow, And The Lender (As Defined In The Motion) To Advance Up To \$800,000 In The Aggregate, Including An Initial Advance In The Amount Of \$350,000 And A Subsequent Advance Of Up To \$450,000, At An Interest Rate Of 8% Per Annum, With The Full Balance, Including All Accrued Interest, Due And Payable In One Year From The Start Date (As Defined In The Note), With Payments First Credited To Interest Due And Any Remainder Credited To Principal, As Provided Under The Note, Subject To The Terms Of This Order. Sets A Final Hearing On The Motion For July 20, 2023 At 9:30 A.M. In Courtroom 5C, Located At 41 West Fourth Street, Santa Ana, CA 92701. (SEE ORDER FOR FURTHER RULING) (BNC-PDF) (Related Doc 119) Signed on 6/22/2023 (NB8)). (Lissebeck, Yosina) (Entered: 06/29/2023)</i>
06/29/2023	161 (4 pgs)	Request for special notice <i>Notice of Appearance and Request For Special Notice and Service of Papers, and Request For Inclusion on Master Mailing List</i> Filed by Creditor Committee Committee of Unsecured Creditors. (Koffroth, Nicholas) (Entered: 06/29/2023)
06/29/2023	162 (5 pgs)	BNC Certificate of Notice - PDF Document. (RE: related document(s) 151 <i>Order on Generic Motion (BNC-PDF)</i>) No. of Notices: 1. Notice Date 06/29/2023. (Admin.) (Entered: 06/29/2023)

06/30/2023	163 (24 pgs)	Declaration re: <i>Declaration that No Party Requested a Hearing on Motion with Proof of Service and Attachment</i> Filed by Accountant Grobstein Teeple LLP (RE: related document(s) 95 Application to Employ Grobstein Teeple LLP as Accountant <i>Notice of Application and Application of Chapter 11 Trustee, Richard A. Marshack, for Authorization to Employ Grobstein Teeple LLP as Accountants Effective May 12, 2023; Statement of Disinterestedness; Proof of Service; Exhibits A-B</i> Filed by Accountant Grobstein Teeple LLP.). (Teeple, Joshua) (Entered: 06/30/2023)
06/30/2023	164 (18 pgs)	Declaration re: <i>of Richard A. Marshack, Chapter 11 Trustee, Providing Copies of Executed Notes</i> Filed by Trustee Richard A Marshack (TR) (RE: related document(s) 156 Notice). (Lissebeck, Yosina) (Entered: 06/30/2023)
06/30/2023	167	Hearing Continued (RE: related document 156 Trustee's Ex Parte Notice Of Non-Material Modification To Promissory Note With Additional Lender As Part Of Previously Approved Post-Petition Financing And Request For Approval Of Same) HEARING ON MOTION CONTINUED TO AUGUST 10, 2023 AT 10:00 A.M. IN COURTROOM 5C, LOCATED AT 411 WEST FOURTH STREET, SANTA ANA, CA 92701. The case judge is Scott C Clarkson (NB8) Modified on 7/10/2023 (NB8). (Entered: 07/03/2023)

PACER Service Center			
Transaction Receipt			
11/15/2023 14:11:28			
PACER Login:	kmarch80366	Client Code:	P Han Jayde Trinh
Description:	Docket Report	Search Criteria:	8:23-bk-10571-SC Fil or Ent: filed From: 5/1/2023 To: 6/30/2023 Doc From: 0 Doc To: 99999999 Term: included Format: html Page counts for documents: included
Billable Pages:	13	Cost:	1.30

PETER C. ANDERSON
UNITED STATES TRUSTEE
KENNETH M. MISKEN
ASSISTANT UNITED STATES TRUSTEE
QUEENIE K. NG (State Bar No. 223803)
TRIAL ATTORNEY
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Queenie.K.Ng@usdoj.gov



UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA - SANTA ANA DIVISION

In re:

**THE LITIGATION PRACTICE GROUP,
P.C.,**

Debtor.

Case Number 8:23-bk-10571-SC

CHAPTER 11

**ORDER APPROVING THE U.S. TRUSTEE'S
APPLICATION FOR THE APPOINTMENT
OF A CHAPTER 11 TRUSTEE**

[NO HEARING REQUIRED]

Upon consideration of the Application (the "Application") for the Appointment of a Chapter 11 Trustee (filed on May 8, 2023, as Bankr. Dkt. # 64) filed by the United States Trustee for Region 16 ("U.S. Trustee") and good cause appearing therefore:

IT IS HEREBY ORDERED THAT the U.S. Trustee's Application is approved and Richard A. Marshack is appointed as the Chapter 11 Trustee in the above captioned case.

IT IS SO ORDERED.

Date: May 8, 2023



Scott C. Clarkson
United States Bankruptcy Judge

EXHIBIT B

U.S. Bankruptcy Court
Central District of California (Santa Ana)
Adversary Proceeding #: 8:23-ap-01046-SC

Assigned to: Scott C Clarkson

Date Filed: 05/25/23

Lead BK Case: [23-10571](#)

Lead BK Title: The Litigation Practice Group P.C.

Lead BK Chapter: 11

Demand:

Nature[s] of Suit: 72 Injunctive relief - other

13 Recovery of money/property - 548 fraudulent transfer

11 Recovery of money/property - 542 turnover of property

Plaintiff

Richard A. Marshack, Chapter 11 Trustee

represented by **Christopher Celentino**

Dinsmore & Shohl LLP

655 W. Broadway

Suite 800

San Diego, CA 92101

619-400-0519

Fax : 619-400-0501

Email: christopher.celentino@dinsmore.com

Christopher Ghio

Dinsmore & Shohl, LLP

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San Diego, CA 92101

619-400-0500

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LEAD ATTORNEY

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213-335-7758

Email: jonathan.serrano@dinsmore.com

EXHIBIT C

V.

Defendant

Tony Diab

represented by **Tony Diab**
PRO SE

Teri T Pham

Enenstein Pham Glass & Rabbat, LLP
3200 Bristol St Ste 500
Costa Mesa, CA 92626
(714) 292-0262
Fax : (714) 464-4770
Email: tpham@epgrlawyers.com
TERMINATED: 10/17/2023

Defendant

Daniel S. March

represented by **Daniel S March**
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Teri T Pham

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3200 Bristol St Ste 500
Costa Mesa, CA 92626
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Email: tpham@epgrlawyers.com
TERMINATED: 09/21/2023

Defendant

Rosa Bianca Lori

represented by **Leslie A Cohen**
Leslie Cohen Law PC
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Santa Monica, CA 90403
310-394-5900
Fax : 310-394-9280
Email: leslie@lesliecohenlaw.com

Defendant

Lisa Cohen

represented by **Leslie A Cohen**
(See above for address)

Defendant

William Taylor Carss

represented by **William Taylor Carss**
PRO SE

Defendant

Eng Tang

represented by **Eng Tang**
PRO SE

Defendant

Maria Eeya Tan

represented by **Maria Eeya Tan**
PRO SE

Defendant

Jake Akers

represented by **Jake Akers**
PRO SE

Defendant

Han Trinh

represented by **Kathleen P March**
The Bankruptcy Law Firm, PC
10524 W. Pico Blvd Ste 212
Los Angeles, CA 90064
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Douglas A Plazak
POB 1300
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951-682-1771
Fax : 951-686-2415
Email: dplazak@rhlaw.com
TERMINATED: 09/12/2023

Defendant

Jayde Trinh

represented by **Kathleen P March**
(See above for address)

Douglas A Plazak
(See above for address)
TERMINATED: 09/12/2023

Defendant

Wes Thomas

represented by **Wes Thomas**
PRO SE

Defendant

Scott James Eadie

represented by **Douglas A Plazak**
(See above for address)

Defendant

Jimmy Chhor

represented by **Jimmy Chhor**
PRO SE

Defendant

Dongliang Jiang

represented by **Dongliang Jiang**
PRO SE

Defendant

Oakstone Law Group PC

represented by **Oakstone Law Group PC**
PRO SE

Defendant

Greyson Law Center PC

represented by **Kathleen P March**
(See above for address)

Douglas A Plazak

Defendant

Phoenix Law Group, Inc.

represented by **Phoenix Law Group, Inc.**
PRO SE

Defendant

Maverick Management, LLC

represented by **Maverick Management, LLC**
PRO SE

Defendant

LGS Holdco, LLC

represented by **Daniel A Lev**
Greenspoon Marder, PA
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Ste 1900
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213-626-2311
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Defendant

Consumer Legal Group, PC

represented by **Daniel A Lev**
(See above for address)

Ronald N Richards
Law Offices of Ronald Richards & Assoc
PO Box 11480
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310-556-1001
Fax : 310-277-3325
Email: ron@ronaldrichards.com

Defendant

Vulcan Consulting Group LLC

represented by **Vulcan Consulting Group LLC**
PRO SE

Defendant

B.A.T. Inc.
dba Coast Processing

represented by **B.A.T. Inc.**
PRO SE

Defendant

Prime Logix, LLC

represented by **Prime Logix, LLC**
PRO SE

Defendant

Teracel Blockchain Fund II LLC

represented by **Teracel Blockchain Fund II LLC**
PRO SE

Defendant

EPPS

represented by **EPPS**
PRO SE

Defendant

Equipay

represented by **Equipay**
PRO SE

Defendant

Authorize Net

represented by **Authorize Net**
PRO SE

Defendant

World Global

represented by **World Global**
PRO SE

Defendant

**Optimumbank Holdings, Inc.
dba Optimum Bank**

represented by **Optimumbank Holdings, Inc.**
PRO SE

Defendant

Marich Bein, LLC

represented by **David S Kupetz**
Locke Lord LLP
300 South Grand Ave Ste 2600
Los Angeles, CA 90071
(213) 485-1500
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Email: David.Kupetz@lockelord.com

Defendant

BankUnited, N.A.

represented by **Howard Steinberg**
Greenberg Traurig LLP
1840 Century Park East Ste 1900
Los Angeles, CA 90067-2121
310-586-7702
Fax : 310-586-0228
Email: steinbergh@gtlaw.com

Defendant

Revolv3, Inc.

represented by **Revolv3, Inc.**
PRO SE

Defendant

**Fidelity National Information Services,
Inc.
dba FIS**

represented by **Fidelity National Information Services, Inc.**
PRO SE

Defendant

represented by **Worldpay, Inc.**

Defendant

Worldpay Group

represented by **Worldpay Group**
PRO SE

Defendant

Merit Fund, LLC

represented by **Merit Fund, LLC**
PRO SE

Defendant

Guardian

represented by **Guardian**
PRO SE

Defendant

The United States Postal Service

represented by **The United States Postal Service**
PRO SE

Defendant

Fidelity National Information Services,
Inc. dba FIS

represented by **Michael T Delaney**
Baker & Hostetler LLP
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216-621-0200
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Defendant

Worldpay, LLC

represented by **Worldpay, LLC**
PRO SE

Defendant

Touzi Capital, LLC

represented by **Daniel H Reiss**
Levene, Neale, Bender, Yoo & Golubchik L.L.P.
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Defendant

Heng Taing

represented by **Heng Taing**
PRO SE

Defendant

Eng Taing

represented by **Daniel H Reiss**
(See above for address)

Defendant

Stripe, Inc.

represented by **Eric D Goldberg**
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Defendant

Seamless Chex Inc.

represented by **Seamless Chex Inc.**
PRO SE

Defendant

Phoenix Law, PC

represented by **Phoenix Law, PC**
PRO SE

Defendant

Payliance, LLC

represented by **Keith Barnett**
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Defendant

Maverick Management Group, LLC

represented by **Maverick Management Group, LLC**
PRO SE

Defendant

Guardian Processing, LLC

represented by **Guardian Processing, LLC**
PRO SE

Defendant

Dwolla, Inc.

represented by **Dwolla, Inc.**
PRO SE

Defendant

Max Chou

represented by **Max Chou**
PRO SE

Defendant

BAT Inc. dba Coast Processing

represented by **BAT Inc. dba Coast Processing**
PRO SE

Defendant

Gallant Law Group

represented by **Meredith King**
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619-872-2520
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Defendant

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dba Optimum Bank**

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Trustee

Richard A Marshack (TR)
Marshack Hays Wood LLP
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949-333-7777

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619-400-0500
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U.S. Trustee

United States Trustee (SA)

represented by **Kenneth Miskin**

Office of the United States Trustee
 411 W. Fourth Street, #7160
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 714-338-3405
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 LEAD ATTORNEY

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 Fax : 714-338-3421
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 LEAD ATTORNEY

Filing Date	#	Docket Text
05/25/2023	1 (29 pgs)	Adversary case 8:23-ap-01046. Complaint by Plaintiff: Richard A. Marshack against Defendants: Tony Diab , Daniel S. March , Rosa Bianca Loli , Lisa Cohen , William Taylor Carss , Eng Tang , Maria Eeya Tan , Jake Akers , Han Trinh , Jayde Trinh , Wes Thomas , Scott James Eadie , Jimmy Chhor , Dongliang Jiang , Oakstone Law Group PC , Greyson Law Center PC , Phoenix Law Group, Inc. , Maverick Management, LLC , LGS Holdco, LLC , Consumer Legal Group, PC , Vulcan Consulting Group LLC , B.A.T. Inc. , Prime Logix, LLC , Teracel Blockchain Fund II LLC , EPPS , Equipay , Authorize Net , World Global , Optimumbank Holdings, Inc. , Marich Bein, LLC , BankUnited, N.A. , Revolv3, Inc. , Fidelity National Information Services, Inc. , Worldpay, Inc. , Worldpay Group , Merit Fund, LLC , Guardian , The United States Postal Service . Fee Amount \$350 Nature of Suit: (72 (Injunctive relief - other)) ,(13 (Recovery of money/property - 548 fraudulent transfer)) ,(11 (Recovery of money/property - 542 turnover of property)) (VN) (Entered: 06/08/2023)
05/25/2023	2 (3 pgs)	Document Sealed - Motion to file under seal (HC) (Entered: 05/25/2023) (NB8) (Entered: 06/08/2023)
05/25/2023	3 (5 pgs)	Document Sealed - Memorandum of Points and Authorities in support of motion to file under seal. (HC) (Entered: 05/25/2023) (NB8) (Entered: 06/08/2023)
05/25/2023	4 (37 pgs)	Document Sealed - Omnibus emergency motion. (HC) (Entered: 05/25/2023) (NB8) (Entered: 06/08/2023)
05/25/2023	5 (52 pgs)	Document Sealed - Declaration #1 in support of emergency motion. (HC) (Entered: 05/25/2023) (NB8) (Entered: 06/08/2023)

05/25/2023	6 (21 pgs)	Document Sealed - Declaration #2 in support of emergency motion. (HC) (Entered: 05/25/2023) (NB8) (Entered: 06/08/2023)
05/25/2023	7 (72 pgs)	Document Sealed - Declaration #3 in support of emergency motion. (HC) (Entered: 05/25/2023) (NB8) (Entered: 06/08/2023)
05/25/2023	8 (217 pgs; 3 docs)	Document Sealed - Declaration #4 in support of emergency motion. (HC) Additional attachment(s) added on 5/25/2023 (HC). Additional attachment(s) added on 5/25/2023 (HC). (Entered: 05/25/2023) (NB8) (Entered: 06/08/2023)
05/25/2023	9	Hearing Set (RE: Emergency Motion) The Hearing date is set for 5/25/2023 at 04:00 PM at Crtrm 5C, 411 W Fourth St., Santa Ana, CA 92701. The case judge is Scott C Clarkson (NB8) (Entered: 05/25/2023) (NB8) (Entered: 06/08/2023)
05/25/2023	10	Hearing Held (RE: related document - Emergency Motion) ORDER BY ATTORNEY; MOTION GRANTED. PRELIMINARY INJUNCTION: JUNE 12, 2023 AT 1:30 P.M. IN COURTROOM 5C, LOCATED AT 411 WEST FOURTH STREET, SANTA ANA, CA 92701 (NB8) (Entered: 05/25/2023) (NB8) (Entered: 06/08/2023)
05/26/2023	11 (2 pgs)	Document Sealed - Order (NB8) (Entered: 05/26/2023) (NB8) (Entered: 06/08/2023)
05/26/2023	12	Request for a Certified Copy Fee Amount \$11. (RE: related document(s) 11 Document Sealed) (HC) (Entered: 05/26/2023) (NB8) (Entered: 06/08/2023)
05/26/2023	13 (13 pgs)	Document Sealed - Order On Omnibus Emergency Motion (NB8) (Entered: 05/26/2023) (NB8) (Entered: 06/08/2023)
05/26/2023	14	Request for a Certified Copy Fee Amount \$11. The document will be sent via email to :chris.celentino@dinsmore.com: Filed by Litigant Master File 2023-1 (RE: related document(s) 13 Document Sealed). (Celentino, Christopher) (Entered: 05/26/2023) (NB8) (Entered: 06/08/2023)
05/26/2023	15 (8 pgs)	Summons Issued On Tony Diab Date Issued 5/26/2023, Answer Due June 30, 2023; Daniel S. March Date Issued 5/26/2023, Answer Due June 30, 2023; Rosa Bianca Loli Date Issued 5/26/2023, Answer Due June 30, 2023; Lisa Cohen Date Issued 5/26/2023, Answer Due June 30, 2023; William Taylor Carss Date Issued 5/26/2023, Answer Due June 30, 2023; Eng Tang Date Issued 5/26/2023, Answer Due June 30, 2023; Maria Eeya Tan Date Issued 5/26/2023, Answer Due June 30, 2023; Jake Akers Date Issued 5/26/2023, Answer Due June 30, 2023; Han Trinh Date Issued 5/26/2023, Answer

		<p>Due June 30, 2023; Jayde Trinh Date Issued 5/26/2023, Answer Due June 30, 2023; Wes Thomas Date Issued 5/26/2023, Answer Due June 30, 2023; Scott James Eadie Date Issued 5/26/2023, Answer Due June 30, 2023; Jimmy Chhor Date Issued 5/26/2023, Answer Due June 30, 2023; Dongliang Jiang Date Issued 5/26/2023, Answer Due June 30, 2023; Oakstone Law Group PC Date Issued 5/26/2023, Answer Due June 30, 2023; Greyson Law Center PC Date Issued 5/26/2023, Answer Due June 30, 2023; Phoenix Law Group, Inc. Date Issued 5/26/2023, Answer Due June 30, 2023; Maverick Management, LLC Date Issued 5/26/2023, Answer Due June 30, 2023; LGS Holdco, LLC Date Issued 5/26/2023, Answer Due June 30, 2023; Consumer Legal Group, P.C. Date Issued 5/26/2023, Answer Due June 30, 2023; Vulcan Consulting Group LLC Date Issued 5/26/2023, Answer Due June 30, 2023; B.A.T. Inc. d/b/a Coase Processing Date Issued 5/26/2023, Answer Due June 30, 2023; Prime Logix, LLC Date Issued 5/26/2023, Answer Due June 30, 2023; Teracel Blockchain Fund II LLC Date Issued 5/26/2023, Answer Due June 30, 2023; Equipay Date Issued 5/26/2023, Answer Due June 30, 2023; Authorize.Net Date Issued 5/26/2023, Answer Due June 30, 2023; World Global Date Issued 5/26/2023, Answer Due June 30, 2023; Optimumbank Holdings, Inc. d/b/a Optimum Bank Date Issued 5/26/2023, Answer Due June 30, 2023; Marich Bein, LLC Date Issued 5/26/2023, Answer Due June 30, 2023; BankUnited, N.A. Date Issued 5/26/2023, Answer Due June 30, 2023; Revolv3, Inc. Date Issued 5/26/2023, Answer Due June 30, 2023; Fidelity National Information Services, Inc. d/b/a FIS Date Issued 5/26/2023, Answer Due June 30, 2023; Worldpay, Inc. Date Issued 5/26/2023, Answer Due June 30, 2023; Worldpay Group Date Issued 5/26/2023, Answer Due June 30, 2023 Merit Fund, LLC Date Issued 5/26/2023, Answer Due June 30, 2023; Guardian Date Issued 5/26/2023, Answer Due June 30, 2023; The United States Postal Service Date Issued 5/26/2023, Answer Due June 30, 2023. The Status Conference hearing to be held on August 15, 2023 at 10:30 AM at Courtroom 5C, 411 W Fourth Street, Santa Ana, CA 92701. The case judge is Scott C. Clarkson. (NB8) (Entered: 05/26/2023) (NB8) (Entered: 06/08/2023)</p>
05/26/2023	16	<p>Certified Copy Emailed to chris.celentino@dinsmore.com (Entered: 05/26/2023) (NB8) (Entered: 06/08/2023)</p>
05/30/2023	17	<p>Hearing Set (RE: Preliminary Injunction) The Hearing date is set for 6/12/2023 at 01:30 PM at Crtrm 5C, 411 W Fourth St., Santa Ana, CA 92701. The case judge is Scott C Clarkson (NB8) (Entered: 05/30/2023) (NB8) (Entered: 06/08/2023)</p>
05/30/2023	18	<p>Hearing Set (RE: Complaint) Status Conference hearing to be held on 8/15/2023 at 10:30 AM at Crtrm 5C, 411 W Fourth St., Santa Ana, CA 92701. The case judge is Scott C Clarkson (NB8) (Entered: 05/30/2023) (NB8) (Entered: 06/08/2023)</p>

06/02/2023	19 (17 pgs)	Declaration In Support Issuance Of Amended Order [Docket No. 13] (NB8) (Entered: 06/02/2023) (NB8) (Entered: 06/08/2023)
06/02/2023	20 (1 pg)	Request for courtesy Notice of Electronic Filing (NEF) Filed by Richards, Ronald. (Richards, Ronald) (Entered: 06/02/2023) (NB8) (Entered: 06/08/2023)
06/02/2023	21 (13 pgs)	Amended Order On Omnibus Emergency Motion (BNC-PDF) Signed on 6/2/2023. (NB8) (Entered: 06/02/2023) (NB8) (Entered: 06/08/2023)
06/04/2023	22 (14 pgs)	BNC Certificate of Notice - PDF Document. (RE: related document(s) 21 Amended Order (BNC-PDF)) No. of Notices: 0. Notice Date 06/04/2023. (Admin.) (Entered: 06/04/2023) (NB8) (Entered: 06/08/2023)
06/06/2023	23 (1 pg)	Request for courtesy Notice of Electronic Filing (NEF) by Kenneth Miskin, Assistant United States Trustee Filed by Miskin, Kenneth. (Miskin, Kenneth) (Entered: 06/06/2023) (NB8) (Entered: 06/08/2023)
06/06/2023	24 (3 pgs)	Request that the Clerk Issue Another Summons and Notice of Status Conference (LBR 7004-1(a)(1)(B)) (NB8) (Entered: 06/06/2023) (NB8) (Entered: 06/08/2023)
06/06/2023	25 (8 pgs)	Another Summons Issued On Rosa Bianca Loli Date Issued 06/06/2023, Answer Due 07/11/2023; And Lisa Cohen Date Issued 06/06/2023, Answer Due 07/11/2023. Status Conference Hearing To Be Held On 08/29/2023 At 10:30 A.M. At Courtroom 5C, 411 West Fourth Street, Santa Ana, CA 92701. The Case Judge Is Scott C. Clarkson. (NB8) (Entered: 06/06/2023) (NB8) (Entered: 06/08/2023)
06/07/2023	26 (2 pgs)	Chapter 11 Trustee's Motion To Unseal Case 8:23-mp-102 (NB8) (Entered: 06/07/2023) (NB8) (Entered: 06/08/2023)
06/07/2023	27 (2 pgs)	Order On Chapter 11 Trustee's Motion To Unseal Case. IT IS ORDERED: That Certain ORDER GRANTING TRUSTEE'S MOTION FOR PERMISSION TO FILE OMNIBUS EMERGENCY MOTION AFTER SERVICE OF COURTESY COPY AND AFTER HEARING, AND UNDER SEAL Is Hereby Dissolved And The Identified Matters Within Adversary Proceeding Are No Longer Subject To SEAL. (SEE ORDER FOR FURTHER RULING) (Related Doc # 26) Signed on 6/7/2023 (NB8) (Entered: 06/07/2023) (NB8) (Entered: 06/08/2023)
06/08/2023	28 (1 pg)	Transcript Order Form , regarding Hearing Date 05/25/23 Filed by U.S. Trustee United States Trustee (SA) (RE: related

		document(s) Omnibus Emergency Motion). (SD8) (Entered: 06/08/2023) (NB8). (Entered: 06/08/2023)
06/08/2023	29	Transcript Record Transmittal (Court transcript records have been uploaded to FDS). For Order Number: 23-SC-26. RE Hearing Date: 05/25/23, [TRANSCRIPTION SERVICE PROVIDER: Briggs Reporting Co, Inc, Telephone number (310) 410-4151.] (RE: related document(s)28 Transcript Order Form (Public Request) filed by U.S. Trustee United States Trustee (SA)) (SD8) (Entered: 06/08/2023) (NB8) (Entered: 06/08/2023)
06/08/2023	30 (9 pgs)	Proof of service of <i>Order Advancing Status Conference to Be Heard Concurrently with the Related Matters and Requiring Notice</i> Filed by Trustee Richard A Marshack (TR). (Celentino, Christopher) (Entered: 06/08/2023)
06/08/2023	31 (12 pgs)	Summons Service Executed on Jake Akers 6/2/2023; Authorize Net 6/2/2023; B.A.T. Inc. 6/2/2023; BankUnited, N.A. 6/2/2023; William Taylor Carss 6/2/2023; Jimmy Chhor 6/2/2023; Lisa Cohen 6/2/2023; Consumer Legal Group, PC 6/2/2023; Tony Diab 6/2/2023; Scott James Eadie 6/2/2023; Equipay 6/2/2023; Fidelity National Information Services, Inc. 6/2/2023; Greyson Law Center PC 6/2/2023; Guardian 6/2/2023; Dongliang Jiang 6/2/2023; LGS Holdco, LLC 6/2/2023; Rosa Bianca Loli 6/2/2023; Daniel S. March 6/2/2023; Marich Bein, LLC 6/2/2023; Maverick Management, LLC 6/2/2023; Merit Fund, LLC 6/2/2023; Oakstone Law Group PC 6/2/2023; Optimumbank Holdings, Inc. 6/2/2023; Phoenix Law Group, Inc. 6/2/2023; Prime Logix, LLC 6/2/2023; Revolv3, Inc. 6/2/2023; Maria Eeya Tan 6/2/2023; Eng Tang 6/2/2023; Teracel Blockchain Fund II LLC 6/2/2023; Wes Thomas 6/2/2023; Han Trinh 6/2/2023; Jayde Trinh 6/2/2023; Vulcan Consulting Group LLC 6/2/2023; World Global 6/2/2023; Worldpay Group 6/2/2023; Worldpay, Inc. 6/2/2023 (Celentino, Christopher) (Entered: 06/08/2023)
06/08/2023	32 (10 pgs)	Summons Service Executed on Tony Diab 6/2/2023 (Celentino, Christopher) (Entered: 06/08/2023)
06/08/2023	33 (10 pgs)	Summons Service Executed on B.A.T. Inc. 6/2/2023 (Celentino, Christopher) (Entered: 06/08/2023)
06/08/2023	34 (4 pgs)	Proof of service for <i>Approvely Inc.</i> Filed by Plaintiff Richard A. Marshack. (Celentino, Christopher) (Entered: 06/08/2023)
06/08/2023	35 (4 pgs)	Proof of service for <i>Amazon.com, Inc.</i> Filed by Plaintiff Richard A. Marshack. (Celentino, Christopher) (Entered: 06/08/2023)

06/08/2023	36 (4 pgs)	Proof of service for <i>Bank United N.A.</i> Filed by Plaintiff Richard A. Marshack. (Celentino, Christopher) (Entered: 06/08/2023)
06/08/2023	37 (4 pgs)	Proof of service for <i>Optimum Bank Holdings Inc.</i> Filed by Plaintiff Richard A. Marshack. (Celentino, Christopher) (Entered: 06/08/2023)
06/08/2023		Receipt of Adversary Filing Fee - \$350.00 by 16. Receipt Number 80076736. (admin) (Entered: 06/08/2023)
06/09/2023	38 (9 pgs)	Summons Service Executed on Lisa Cohen 6/6/2023; Rosa Bianca Loli 6/6/2023 (Celentino, Christopher) (Entered: 06/09/2023)
06/09/2023	39 (10 pgs)	Summons Service Executed on William Taylor Carss 6/2/2023 (Celentino, Christopher) (Entered: 06/09/2023)
06/09/2023	40 (4 pgs)	Proof of service for <i>Stephanie King</i> Filed by Plaintiff Richard A. Marshack. (Celentino, Christopher) (Entered: 06/09/2023)
06/09/2023	41 (3 pgs)	Proof of service for <i>Han Trinh</i> Filed by Plaintiff Richard A. Marshack. (Celentino, Christopher) (Entered: 06/09/2023)
06/09/2023	42 (7 pgs)	Proof of service for <i>Approvely, Inc., Maverick Bankcard, Inc., Occams Advisory, Inc.</i> Filed by Plaintiff Richard A. Marshack. (Celentino, Christopher) (Entered: 06/09/2023)
06/09/2023	43 (7 pgs)	Proof of service for <i>World Globe, WorldPay, Inc., WorldPay Group</i> Filed by Plaintiff Richard A. Marshack. (Celentino, Christopher) (Entered: 06/09/2023)
06/09/2023	44 (4 pgs)	Proof of service for <i>Revolv3, Inc.</i> Filed by Plaintiff Richard A. Marshack. (Celentino, Christopher) (Entered: 06/09/2023)
06/12/2023	45 (116 pgs; 7 docs)	Status report Filed by Plaintiff Richard A. Marshack (RE: related document(s) 1 Complaint). (Attachments: # 1 Declaration of Richard A. Marshack # 2 Declaration of Christopher Celentino # 3 Declaration of Jonathan Serrano # 4 Declaration of Jeremy B. Freedman # 5 Declaration of Peter M. Schneider # 6 Declaration of Ty Carss) (Celentino, Christopher) (Entered: 06/12/2023)
06/12/2023	46 (7 pgs)	Opposition to (related document(s): 4 Document) <i>Motion for Turnover, Preliminary Injunction, Lock-Out, Redirection of US Mail</i> Filed by Defendant Greyson Law Center PC (Plazak, Douglas) (Entered: 06/12/2023)
06/12/2023	47 (90 pgs; 13 docs)	Opposition to (related document(s): 4 Document) <i>Motion for Turnover, et al.</i> Filed by Defendant Greyson Law Center PC (Attachments: # 1 Dec of Scott Eadie # 2 Declaration of Han

		Trinh # 3 Declaration of Sally Yde # 4 Declaration of Peter Yde III # 5 Declaration of Steven Mader # 6 Declaration of Thomas Ayen # 7 Declaration of Lynn Kohn # 8 Declaration of Danita Goss # 9 Declaration of Leann Babcock-McCallu # 10 Declaration of Debora Jones # 11 Declaration of Keith Weaver # 12 Declaration of Tamer Fawzy (Plazak, Douglas) (Entered: 06/12/2023)
06/12/2023	48 (9 pgs)	Declaration re: <i>of Scott Eadie with Exhibits</i> Filed by Defendant Greyson Law Center PC. (Plazak, Douglas) (Entered: 06/12/2023)
06/12/2023	49 (1 pg)	Request for courtesy Notice of Electronic Filing (NEF) Filed by Richards, Ronald. (Richards, Ronald) (Entered: 06/12/2023)
06/12/2023	50	Hearing Held On Motion (RE: related document 1 Preliminary Injunction) - ORDER BY ATTORNEY - PRELIMINARY INJUNCTION GRANTED (NB8) (Entered: 06/13/2023)
06/13/2023	51 (1 pg)	Notice Request Courtesy Notification of Electronic Filing (NEF) Filed by Creditors MC DVI Fund 2, LLC, MC DVI Fund 1, LLC, Debt Validation Fund II, LLC. (Golubow, Richard) (Entered: 06/13/2023)
06/13/2023	52 (4 pgs)	Proof of service for <i>Netsuite</i> Filed by Plaintiff Richard A. Marshack. (Celentino, Christopher) (Entered: 06/13/2023)
06/13/2023	53 (4 pgs)	Proof of service for <i>Quickbooks - Intuit</i> Filed by Plaintiff Richard A. Marshack. (Celentino, Christopher) (Entered: 06/13/2023)
06/13/2023	54 (4 pgs)	Proof of service for <i>Google</i> Filed by Plaintiff Richard A. Marshack. (Celentino, Christopher) (Entered: 06/13/2023)
06/13/2023	55 (4 pgs)	Proof of service for <i>Microsoft</i> Filed by Plaintiff Richard A. Marshack. (Celentino, Christopher) (Entered: 06/13/2023)
06/13/2023	56 (4 pgs)	Proof of service for <i>Amazon.com</i> Filed by Plaintiff Richard A. Marshack. (Celentino, Christopher) (Entered: 06/13/2023)
06/13/2023	57 (10 pgs)	Summons Service Executed on Authorize Net 6/1/2023 (Celentino, Christopher) (Entered: 06/13/2023)
06/13/2023	58 (10 pgs)	Summons Service Executed on Fidelity National Information Services, Inc. 6/1/2023 (Celentino, Christopher) (Entered: 06/13/2023)
06/14/2023	59 (1 pg)	Request for courtesy Notice of Electronic Filing (NEF) Filed by Still, Andrew. (Still, Andrew) (Entered: 06/14/2023)

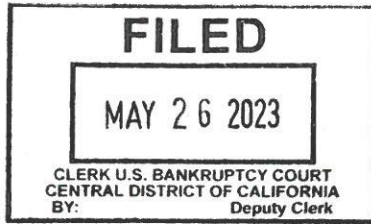
06/15/2023	60 (1 pg)	Request for Recording of Court Proceedings . Fee Amount \$32, Filed by U.S. Trustee United States Trustee (SA) . (JL) (Entered: 06/15/2023)
06/15/2023	61 (2 pgs; 2 docs)	Transcript Order Form , regarding Hearing Date 6/12/23 Filed by U.S. Trustee United States Trustee (SA) . (JL) Additional attachment(s) added on 6/15/2023 (JL). (Entered: 06/15/2023)
06/15/2023	62 (31 pgs)	Amended Complaint by Christopher Ghio on behalf of Richard A. Marshack against Fidelity National Information Services, Inc. dba FIS, Worldpay, LLC, Touzi Capital, LLC, Heng Taing, Eng Taing, Stripe, Inc., Seamless Chex Inc., Phoenix Law, PC, Payliance, LLC, Optimumbank Holdings, Inc. dba Optimum Bank, Maverick Management Group, LLC, Guardian Processing, LLC, Dwolla, Inc., Max Chou, BAT Inc. dba Coast Processing, Jake Akers, Authorize Net, BankUnited, N.A., William Taylor Carss, Jimmy Chhor, Lisa Cohen, Consumer Legal Group, PC, Tony Diab, EPPS, Scott James Eadie, Equipay, Greyson Law Center PC, Dongliang Jiang, LGS Holdco, LLC, Rosa Bianca Loli, Daniel S. March, Marich Bein, LLC, Merit Fund, LLC, Oakstone Law Group PC, Prime Logix, LLC, Revolv3, Inc., Maria Eeya Tan, Teracel Blockchain Fund II LLC, Wes Thomas, Han Trinh, Jayde Trinh, Vulcan Consulting Group LLC, World Global, Worldpay Group. (Ghio, Christopher) (Entered: 06/15/2023)
06/15/2023	63 (1 pg)	Request for courtesy Notice of Electronic Filing (NEF) Filed by White, Johnny. (White, Johnny) (Entered: 06/15/2023)
06/15/2023	64	Transcript Record Transmittal (Court transcript records have been uploaded to FDS). For Order Number: 23-SC-27. RE Hearing Date: 6/12/23, [TRANSCRIPTION SERVICE PROVIDER: BRIGGS REPORTING CO., INC., Telephone number Ph: (310) 410-4151.] (RE: related document(s) 61 Transcript Order Form (Public Request) filed by U.S. Trustee United States Trustee (SA)) (JL) (Entered: 06/15/2023)
06/16/2023	65 (18 pgs)	Notice of lodgment of <i>Order in Adversary Case</i> Filed by Plaintiff Richard A. Marshack (RE: related document(s) 3 Document). (Celentino, Christopher) (Entered: 06/16/2023)
06/16/2023	66 (22 pgs)	Declaration re: <i>Declaration of Christopher Celentino in Support of Notice of Lodgment of Preliminary Injunction</i> Filed by Plaintiff Richard A. Marshack (RE: related document(s) 65 Notice of Lodgment). (Celentino, Christopher) (Entered: 06/16/2023)
06/16/2023	67 (1 pg)	Request for courtesy Notice of Electronic Filing (NEF) Filed by Lev, Daniel. (Lev, Daniel) (Entered: 06/16/2023)

06/20/2023	68 (4 pgs)	Summons Returned Unexecuted Re: Gallant Law Group, Jake Akers, Authorize Net, BAT Inc. dba Coast Processing, BankUnited, N.A., William Taylor Carss, Jimmy Chhor, Max Chou, Lisa Cohen, Consumer Legal Group, PC, Tony Diab, Dwolla, Inc., EPPS, Scott James Eadie, Equipay, Fidelity National Information Services, Inc. dba FIS, Greyson Law Center PC, Guardian Processing, LLC, Dongliang Jiang, LGS Holdco, LLC, Rosa Bianca Loli, Daniel S. March, Marich Bein, LLC, Maverick Management Group, LLC, Merit Fund, LLC, Oakstone Law Group PC, Optimumbank Holdings, Inc. dba Optimum Bank, Payliance, LLC, Phoenix Law, PC, Prime Logix, LLC, Revolv3, Inc., Seamless Chex Inc., Stripe, Inc., Eng Taing, Heng Taing, Maria Eeya Tan, Eng Tang, Teracel Blockchain Fund II LLC, The United States Postal Service, Wes Thomas, Touzi Capital, LLC, Han Trinh, Jayde Trinh, Vulcan Consulting Group LLC, World Global, Worldpay Group, Worldpay, LLC (Celentino, Christopher) (Entered: 06/20/2023)
06/22/2023	69 (6 pgs)	Request that the Clerk Issue Another Summons and Notice of Status Conference (LBR 7004-1(a)(1)(B)) Filed by Plaintiff Richard A. Marshack. (Ghio, Christopher) (Entered: 06/22/2023)
06/23/2023	70 (15 pgs)	Order On Trustee, Richard Marshack's Omnibus Motion Granting: (1) Turnover Of Estate Property And Recorded Information Pursuant To 11 U.S.C. Section 542; (2) Preliminary Injunction; (3) Lock-Out; (4) Re-Direction Of United States Parcel Services Mail; (5) Order To Show Cause RE Compliance With Court Order; And (6) Other Relief As Necessary To Efficient Administration Of This Matter. (SEE ORDER FOR FURTHER RULING) (BNC-PDF) (Related Doc # 4) Signed on 6/23/2023 (NB8) (Entered: 06/23/2023)
06/23/2023	71 (9 pgs; 2 docs)	Another Summons Issued on BAT Inc. dba Coast Processing Date Issued 6/23/2023, Answer Due 7/24/2023; Jimmy Chhor Date Issued 6/23/2023, Answer Due 7/24/2023; Max Chou Date Issued 6/23/2023, Answer Due 7/24/2023; Dwolla, Inc. Date Issued 6/23/2023, Answer Due 7/24/2023; Guardian Processing, LLC Date Issued 6/23/2023, Answer Due 7/24/2023; Maverick Management Group, LLC Date Issued 6/23/2023, Answer Due 7/24/2023; Payliance, LLC Date Issued 6/23/2023, Answer Due 7/24/2023; Phoenix Law, PC Date Issued 6/23/2023, Answer Due 7/24/2023; Seamless Chex Inc. Date Issued 6/23/2023, Answer Due 7/24/2023; Stripe, Inc. Date Issued 6/23/2023, Answer Due 7/24/2023; Eng Taing Date Issued 6/23/2023, Answer Due 7/24/2023; Heng Taing Date Issued 6/23/2023, Answer Due 7/24/2023; Touzi Capital, LLC Date Issued 6/23/2023, Answer Due 7/24/2023; Worldpay, LLC Date Issued 6/23/2023, Answer Due 7/24/2023 (RE: related document(s) 69 Request that the Clerk Issue Another Summons and Ntc of Status Conf (AP) filed by Plaintiff Richard A. Marshack) Status Conference

		Hearing to be held on 9/12/2023 at 01:30 PM at Crtrm 5C, 411 W Fourth St., Santa Ana, CA 92701. The case judge is Scott C Clarkson (NB8) (Entered: 06/23/2023)
06/23/2023	72 (1 pg)	Request for courtesy Notice of Electronic Filing (NEF) Filed by Cohen, Leslie. (Cohen, Leslie) (Entered: 06/23/2023)
06/23/2023	73 (15 pgs; 4 docs)	Notice <i>Notice of Required Compliance with Rule 7026 of the Federal Rules of Bankruptcy Procedure and Rule 7026-1 of the Local Bankruptcy Rules</i> Filed by Plaintiff Richard A. Marshack. (Attachments: # 1 Exhibit Exhibit 1 # 2 Exhibit Exhibit 1(b) # 3 Exhibit Exhibit 2)(Serrano, Jonathan) (Entered: 06/23/2023)
06/23/2023	74 (13 pgs)	Status report <i>Status Conference Report</i> Filed by Plaintiff Richard A. Marshack (RE: related document(s) 71 Another Summons Issued). (Serrano, Jonathan) (Entered: 06/23/2023)
06/25/2023	75 (18 pgs)	BNC Certificate of Notice - PDF Document. (RE: related document(s) 70 Order on Generic Motion (BNC-PDF)) No. of Notices: 1. Notice Date 06/25/2023. (Admin.) (Entered: 06/25/2023)
06/27/2023	76 (269 pgs)	Transcript regarding Hearing Held 06/12/23 RE: HEARING RE: PRELIMINARY INJUNCTION STATUS CONFERENCE HEARING RE: (1) CASE MANAGEMENT CONFERENCE AND (2) REQUIRING STATUS REPORT. Remote electronic access to the transcript is restricted until 09/25/2023. The transcript may be viewed at the Bankruptcy Court Clerk's Office on a public terminal or purchased through the Transcription Service Provider before the transcript access restriction has ended. [TRANSCRIPTION SERVICE PROVIDER: BRIGGS REPORTING COMPANY, INC., Telephone number 310-410-4151.]. Notice of Intent to Request Redaction Deadline Due By 7/5/2023. Redaction Request Due By 07/18/2023. Redacted Transcript Submission Due By 07/28/2023. Transcript access will be restricted through 09/25/2023. (Steinhauer, Holly) (Entered: 06/27/2023)
06/27/2023	77 (6 pgs)	Stipulation By Richard A. Marshack and <i>Stipulation for Judgment (1) Avoiding, Recovering, and Preserving Transfers to Defendant, Phoenix Law Group, Inc.; (2) Turning Over of All Transferred Property to Trustee; and (3) Dismissing Without Prejudice Defendants William Taylor Carss and Maria Eeya Tan</i> Filed by Plaintiff Richard A. Marshack (Ghio, Christopher) (Entered: 06/27/2023)
06/28/2023	78 (3 pgs)	Proof of service <i>Supplemental Proof of Service For Stipulation (1) Avoiding, Recovering, and Preserving Transfers to Defendant, Phoenix Law Group, Inc.; (2) Turning Over of All Transferred Property to Trustee; and (3)</i>

Case 8:23-bk-10571-SC Doc 674 Filed 11/17/23 Entered 11/17/23 17:55:17 Desc Main Document Page 81 of 108		Dismissing Without Prejudice Defendants William Taylor Carss and Maria Eeya Tan Filed by Plaintiff Richard A. Marshack (RE: related document(s) 77 Stipulation By Richard A. Marshack and Stipulation for Judgment (1) Avoiding, Recovering, and Preserving Transfers to Defendant, Phoenix Law Group, Inc.; (2) Turning Over of All Transferred Property to Trustee; and (3) Dismissing Without Prejudice). (Serrano, Jonathan) (Entered: 06/28/2023)
06/30/2023	79 (20 pgs)	Answer to Complaint Defendant Marich Bein, LLC's Answer To Plaintiff Richard A. Marshack's Amended Complaint Filed by Marich Bein, LLC. (Kupetz, David) (Entered: 06/30/2023)
06/30/2023	80 (5 pgs)	Notice Notice of Appearance Of Counsel For Defendant Marich Bein, LLC Filed by Defendant Marich Bein, LLC. (Kupetz, David) (Entered: 06/30/2023)
06/30/2023	81 (15 pgs)	Stipulation By Richard A. Marshack and Stipulation re Partial Settlement of Claims and Modification of Order on Trustee, Richard Marshack's Omnibus Emergency Motion as to Covered Parties and Defendants, Consumer Legal Group, P.C. and LGS HoldCo, LLC Filed by Plaintiff Richard A. Marshack (Ghio, Christopher) (Entered: 06/30/2023)
06/30/2023	82 (3 pgs)	Proof of service Supplemental Proof of Service for Stipulation re Partial Settlement of Claims and Modification of Order on Trustee, Richard Marshack's Omnibus Emergency Motion as to Covered Parties and Defendants, Consumer Legal Group, P.C. and LGS Holdco, LLC Filed by Plaintiff Richard A. Marshack. (Serrano, Jonathan) (Entered: 06/30/2023)

PACER Service Center			
Transaction Receipt			
11/15/2023 14:14:39			
PACER Login:	kmarch80366	Client Code:	P Han Jayde Trinh
Description:	Docket Report	Search Criteria:	8:23-ap-01046-SC Fil or Ent: filed To: 6/30/2023 Doc From: 0 Doc To: 99999999 Term: included Format: html Page counts for documents: included
Billable Pages:	10	Cost:	1.00



CHANGES MADE BY COURT

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA - SANTA ANA DIVISION

In re:

THE LITIGATION PRACTICE GROUP P.C.,
Debtor.

Case No.: 8:23-MP-00102

Chapter 11: 8:23-bk-10571

RICHARD A. MARSHACK,
Chapter 11 Trustee,

Plaintiff,

v.

TONY DIAB, an individual; DANIEL S.
MARCH, an individual; ROSA BIANCA LOLI,
an individual; LISA COHEN, an individual;
WILLIAM TAYLOR CARSS, an individual;
ENG TANG, an individual; MARIA EEYA TAN,
an individual; JAKE AKERS, an individual; HAN
TRINH, an individual; JAYDE TRINH, an
individual; WES THOMAS, an individual;
SCOTT JAMES EADIE, an individual; JIMMY
CHHOR, an individual; DONGLIANG JIANG,
an individual; OAKSTONE LAW GROUP PC;
GREYSON LAW CENTER PC; PHOENIX
LAW GROUP, INC.; MAVERICK
MANAGEMENT, LLC; LGS HOLDCO, LLC;
CONSUMER LEGAL GROUP, P.C.; VULCAN
CONSULTING GROUP LLC; B.A.T. INC. d/b/a
COAST PROCESSING; PRIME LOGIX, LLC;
TERACEL BLOCKCHAIN FUND II LLC;
EPPS; EQUIPAY; AUTHORIZE.NET; WORLD
GLOBAL; OPTIMUMBANK HOLDINGS, INC.
d/b/a OPTIMUM BANK; MARICH BEIN, LLC;

**ORDER ON TRUSTEE, RICHARD
MARSHACK'S OMNIBUS *EMERGENCY*
MOTION FOR:**

- 1) TURNOVER OF ESTATE PROPERTY
AND RECORDED INFORMATION
PURSUANT TO 11 U.S.C. § 542;**
- 2) PRELIMINARY INJUNCTION;**
- 3) LOCK-OUT;**
- 4) RE-DIRECTION OF UNITED STATES
PARCEL SERVICES MAIL;**
- 5) ORDER TO SHOW CAUSE RE
COMPLIANCE WITH COURT ORDER;
AND**
- 6) OTHER RELIEF AS NECESSARY TO
EFFICIENT ADMINISTRATION OF THIS
MATTER**

Date: May 25, 2023

Time: 4:00 P.M.

Judge: Hon. Scott C. Clarkson

Place: Courtroom 5C

411 W. Fourth Street
Santa Ana, CA 92701

EXHIBIT D

1 BANKUNITED, N.A.; REVOLV3, INC.;
2 FIDELITY NATIONAL INFORMATION
3 SERVICES, INC. d/b/a FIS; WORLDPAY, INC.;
4 WORLDPAY GROUP; MERIT FUND, LLC;
5 GUARDIAN PROCESSING, LLC; THE
UNITED STATES POSTAL SERVICE; and
DOES 1 through 100, inclusive,
Defendants.

1 In his capacity as the duly appointed and acting Chapter 11 Trustee, Richard Marshack
2 (“Trustee”) filed an Omnibus Emergency Motion for Turnover of Estate Property and Recorded
3 Information Pursuant to 11 U.S.C. § 542; Preliminary Injunction; Lock-Out; Re-Direction of United
4 States Postal Service Mail; Setting an Order To Show Cause re Compliance with the Court’s Order
5 as to Tony Diab, Rosa Loli aka Rosa Bianca Loli aka Bianca Loli (“Rosa Loli”), Lisa Cohen, Daniel
6 March and William Tyson “Ty” Carss; and Other As Necessary to the Efficient Administration of
7 this Matter under seal on May 25, 2023, which matter was heard on May 25, 2023, pursuant to Local
8 Bankruptcy Rule 9075-1. The Court, having considered the pleadings on file and the discussion of
9 the parties at the hearing, and having placed its findings of fact and conclusions of law in support of
10 this order orally on the record at the hearing, and finding that exigent circumstances exist and good
11 cause appearing therefor, hereby **ORDERS AS FOLLOWS:**

12 **TURNOVER ORDER OF ESTATE PROPERTY AND RECORDED INFORMATION:**

13 **A. RECORDED INFORMATION**

14 Within twenty-four (24) hours from the date of this Order or notice thereof, whichever is
15 later, the following information regarding any and all persons who signed a Legal Services Contract
16 with LPG or whose file was purchased or otherwise transferred to LPG; OakStone Legal Group, P.C.
17 (“OakStone”); Greyson Law, P.C. (“Greyson”); Gallant Law Group (“Gallant”); Phoenix Law
18 Group, P.C. (Phoenix”); LGS Holdco., LLC; Consumer Legal Group, P.C. (“CLG”); Maverick
19 Management, LLC (“Maverick”); Vulcan Consulting Group, LLC (“Vulcan”); BAT Inc. d/b/a Coast
20 Processing (“Coast Processing”); Strategic Consulting Solutions, LLC (“SCS”); Prime Logix, LLC
21 (“Prime Logix”); Tony Diab; Rosa Loli aka Rosa Bianca Loli aka Bianca Loli (“Rosa Loli”); Lisa
22 Cohen; Eng Tang; Maria Eeya Tan; Jake Akers; Jayde Trinh; Wes Thomas; Scott James; Eadie,
23 Jummi Chhor; Dongliang Jiang; and/or any other alias’, agents or corporate entities affiliated with
24 same, for which the client’s file remains open and/or continues to make payments under an agreed
25 upon installment contract, except those clients who signed a Legal Services Contract post-petition
26 (hereinafter “Client”) shall be turned over to the Trustee by Debtor:

27 1. All Client files, including but not limited to names, contact information, client file
28 management, communications, account information, letters, pleadings, communications, payment

1 history, financial account information, credit reports, executed legal services contracts, automated
2 clearing house ("ACH") contracts, executed installment contracts, account balances, debts in dispute,
3 payment history, file status, settlements, debt invalidations and/or any other information created,
4 managed and stored electronically utilizing DebtPayPro, a Forth, Inc. ("DPP") software program's
5 software license, key or account, that was opened and is maintained and controlled by LPG;
6 OakStone; Greyson; Gallant; Phoenix; LGS Holdco., LLC; CLG; Maverick; Vulcan; Coast
7 Processing; SCS; Prime Logix; Tony Diab; Rosa Loli; Lisa Cohen; Eng Tang; Maria Eeya Tan; Jake
8 Akers; Jayde Trinh; Wes Thomas; Scott James; Eadie, Jummi Chhor; Dongliang Jiang; and/or any
9 other alias', agents or corporate entities affiliated with same (the "DPP Data");

10 2. All administrative usernames and passwords that give the Trustee access to any DPP
11 account held, maintained or controlled by LPG; OakStone; Greyson; Gallant; Phoenix; LGS Holdco.,
12 LLC; CLG; Maverick; Vulcan; SCS; Coast Processing; Prime Logix; Tony Diab; Rosa Loli; Lisa
13 Cohen; Eng Tang; Maria Eeya Tan; Jake Akers; Jayde Trinh; Wes Thomas; Scott James; Eadie,
14 Jummi Chhor; Dongliang Jiang; and/or any other alias', agents or corporate entities affiliated with
15 same;

16 3. All Client files, including but not limited to names, contact information, client file
17 management, communications, account information, letters, pleadings, communications, payment
18 history, financial account information, credit reports, executed legal services contracts, ACH
19 contracts, executed installment contracts, account balances, debts in dispute, payment history, file
20 status, settlements, debt invalidations and/or any other information created, managed and stored
21 electronically utilizing proprietary software program "LUNA" hosted on Amazon Web Services
22 ("AWS") and located at the current domain "lunapp.com" that is maintained and controlled by LPG;
23 OakStone; Greyson; Gallant; Phoenix; LGS Holdco., LLC; CLG; Maverick; Vulcan; SCS; Coast
24 Processing; Prime Logix; Tony Diab; Rosa Loli; Lisa Cohen; Eng Tang; Maria Eeya Tan; Jake
25 Akers; Jayde Trinh; Wes Thomas; Scott James; Eadie, Jummi Chhor; Dongliang Jiang; and/or any
26 other alias', agents or corporate entities affiliated with same (the "Luna Data");

27 4. All administrative usernames and passwords that give the Trustee access to any AWS
28 account where Luna, its software program, databases and client information is held, stored and hosted

1 that is maintained or controlled by LPG; OakStone; Greyson; Gallant; Phoenix; LGS Holdco., LLC;
2 CLG; Maverick; SCS; Vulcan; Coast Processing; Prime Logix; Tony Diab; Rosa Loli; Lisa Cohen;
3 Eng Tang; Maria Eeya Tan; Jake Akers; Jayde Trinh; Wes Thomas; Scott James; Eadie, Jummi
4 Chhor; Dongliang Jiang; and/or any other alias', agents or corporate entities affiliated with same;

5 5. All ACH files related to Client information, details, accounts, history of electronic fund
6 transfers ("EFT"), payments, amounts held, interest on held amounts, penalty fees, nonsufficient fund
7 fees or other ACH related charges to the Clients stored electronically or in hard copy associated with
8 ACH processing service providers and/or affiliated financial institutions, including but not limited to
9 EPPS; EquiPay, LLC ("EquiPay"); Merit Fund, LLC ("Merit Fund"); Authorize.net a subsidiary of
10 Visa, Inc. ("Authorize.net"); World Global; OptimumBank Holdings, Inc. dba Optimum Bank
11 ("Optimum Bank"); BankUnited, Inc. ("BankUnited"); Marich Bein, LLC ("Marich Bein");
12 Revolv3, Inc. ("Revolv3"); Fidelity National Information Services, Inc. dba FIS , including but not
13 limited to its subsidiaries Worldpay, Inc., Worldpay Group or any other subsidiaries providing ACH
14 processing services ("FIS"); Guardian Processing, LLC ("Guardian"); and/or any entity associated
15 with the ACH identification transaction "LPG 949-226-6262 #5 2363 RT 9 TOMS RIVER NJ 0875"
16 or any such substantially similar ACH identification transaction (hereinafter the "ACH Data");

17 6. All files, information, reports, spreadsheets, account numbers, routing numbers, and
18 databases related to transfer of funds out of any account opened, maintained and controlled by LPG;
19 OakStone; Greyson; Gallant; Phoenix; LGS Holdco., LLC; CLG; Maverick; SCS; Vulcan; Coast
20 Processing; Prime Logix; Tony Diab; Rosa Loli; Lisa Cohen; Eng Tang; Maria Eeya Tan; Jake
21 Akers; Jayde Trinh; Wes Thomas; Scott James; Eadie, Jummi Chhor; Dongliang Jiang; and/or any
22 other alias', agents or corporate entities affiliated with same that were processed and executed by
23 ACH processing service providers and/or their affiliated financial institutions, including but not
24 limited to EPPS; EquiPay; Merit Fund; Authorize.net; World Global; Optimum Bank; BankUnited;
25 Marich Bein; Revolv3; FIS; Guardian; and/or any entity associated with the ACH identification
26 transaction "LPG 949-226-6262 #5 2363 RT 9 TOMS RIVER NJ 0875" or any such substantially
27 similar ACH identification transaction (hereinafter the "ACH Transfer Data");

1 7. All administrative usernames and passwords that give the Trustee access to any ACH
2 processing accounts, software, database or other program at ACH processing service providers
3 and/or affiliated financial institutions, including but not limited to EPPS; EquiPay; Merit Fund;
4 Authorize.net; World Global; Optimum Bank; BankUnited; Marich Bein; Revolv3; FIS; Guardian;
5 and/or any entity associated with the ACH identification transaction "LPG 949-226-6262 #5 2363
6 RT 9 TOMS RIVER NJ 0875" or any such substantially similar ACH identification transaction used
7 to upload or input Client information, initiate Client ACH EFTs, transfer Client ACH funds to outside
8 financial institutions or otherwise manage any account opened, maintained and controlled by LPG;
9 OakStone; Greyson; Phoenix; LGS Holdco., LLC; CLG; SCS; Vulcan; Coast Processing; Prime
10 Logix; Tony Diab; Rosa Loli; Lisa Cohen; Eng Tang; Maria Eeya Tan; Jake Akers; Jayde Trinh;
11 Wes Thomas; Scott James; Eadie, Jummi Chhor; Dongliang Jiang; and/or any other alias', agents or
12 corporate entities affiliated with same;

13 8. All accounting records, files, data and information for LPG; OakStone; Greyson; Gallant;
14 Phoenix; LGS Holdco., LLC; CLG; SCS; Vulcan; Coast Processing; and Prime Logix stored on
15 NetSuite, Quickbooks and Microsoft SharePoint, G-Suite or other permanent or cloud based systems
16 (hereinafter the "Accounting Data");

17 9. All contracts, records, reports, information, data and details regarding the transfer or sale
18 of any Client files or future Client ACH payments to any other law firm, organization, corporate
19 entity, person(s), or investment group (otherwise known as factoring companies) by LPG; OakStone;
20 Greyson; Phoenix; LGS Holdco., LLC; and/or CLG (hereinafter the "Client Transfer-Out Data");

21 10. All contracts, records, reports, information, data, cost basis, payment information and
22 details regarding the transfer or receipt of any Client files or future Client ACH payments from any
23 other law firm, organization, corporate entity, person(s), investment or marketing group (otherwise
24 known as capping companies) to LPG; OakStone; Greyson; Gallant; Phoenix; LGS Holdco., LLC;
25 Maverick; and/or CLG (hereinafter the "Client Transfer-In Data");

26 11. All information, data, tables, spreadsheets and reports regarding Client information stored
27 on Formgrid, Inc. dba Airtable's ("Airtable") cloud based data management system used by LPG;
28

OakStone; Greyson; Phoenix; LGS Holdco., LLC; and/or CLG to manage the aforementioned information (hereinafter the "Airtable Data"); and

12. All administrative usernames and passwords that give the Trustee access to any Airtable account opened, maintained or controlled by LPG; OakStone; Greyson; Phoenix; LGS Holdco., LLC; Maverick; and/or CLG; and

13. All email accounts related to LPG; OakStone; Greyson; Gallant; Phoenix; LGS Holdco., LLC; and/or CLG stored maintained and/or hosted on Office 365, g-suite or any other email server, whether physical or cloud based servers (hereinafter "Email Data").

B. ESTATE FUNDS

Within five (5) calendar days from the date of this order or notice thereof, whichever is later, the following shall be turned over to the Trustee by Debtor:

1. All post-petition Client ACH payments processed and received by LPG; OakStone; Greyson; Gallant; Phoenix; LGS Holdco., LLC; CLG; Maverick; SCS; Vulcan; Coast Processing; Prime Logix; Tony Diab; Rosa Loli; Lisa Cohen; Eng Tang; Maria Eeya Tan; Jake Akers; Jayde Trinh; Wes Thomas; Scott James; Eadie, Jummi Chhor; Dongliang Jiang; and/or any other alias', agents or corporate entities affiliated with same related to LPG Clients who entered into a Legal Services Agreement pre-petition and who have received the services provided in the contract;

2. The \$6,308,702.72 million dollars in post-petition ACH EFTs processed through LPG's Revolv3, Inc. merchant account from March 2023 to the present, including any amounts that have been transferred, wired or otherwise withdrawn from LPG's Revolv3, Inc. merchant account to OakStone; Greyson; Gallant; Phoenix; LGS Holdco., LLC; CLG; Maverick; SCS; Vulcan; Coast Processing; Prime Logix; Tony Diab; Rosa Loli; Lisa Cohen; Eng Tang; Maria Eeya Tan; Jake Akers; Jayde Trinh; Wes Thomas; Scott James; Eadie, Jummi Chhor; Dongliang Jiang; and/or any other alias', agents or corporate entities affiliated with same;

TEMPORARY RESTRAINING ORDER

From the date of this **ORDER** through and including, June 12, 2023, or as further Ordered by this Court:

1 **1. Control Over ACH Transfers:** All covered entities and individuals (defined below) are
2 hereby enjoined and shall not interfere with any ACH electronic funds transfer being executed
3 pursuant to documents authorizing such transfers to be executed in favor of LPG as follows:

4 a) Covered Entities and Individuals: The following entities and individuals, and
5 anyone acting on their behalf: LPG; OakStone; Greyson; Gallant; Phoenix; LGS Holdco., LLC;
6 CLG; Maverick; Vulcan; Coast Processing; Prime Logix; SCS; Tony Diab; Rosa Loli; Lisa Cohen;
7 Eng Tang; Maria Eeya Tan; Jake Akers; Jayde Trinh; Wes Thomas; Scott James; Eadie, Jummi
8 Chhor; Dongliang Jiang; and/or any other alias', agents or corporate entities affiliated with same
9 shall, absent further order from this Court:

10 i) Enjoined Conduct re ACH Instructions: No covered entity or individual
11 shall initiate, cause to be initiated, or instruct any company or person that processes ACH transfers
12 and/or their affiliated financial institutions, including EPPS; EquiPay; Merit Fund; Authorize.net;
13 World Global; Optimum Bank; BankUnited; Marich Bein; Revolv3; FIS; Guardian; and/or any entity
14 associated with the ACH identification transaction "LPG 949-226-6262 #5 2363 RT 9 TOMS RIVER
15 NJ 0875" or any such substantially similar ACH identification transaction, to execute any ACH EFT
16 on any file, financial institution, or current or former client of LPG, to or for the benefit of LPG,
17 including but not limited to OakStone; Greyson; Phoenix; CLG; Prime Logix; SCS; Maverick;
18 and/or Vulcan, without the express authorization of Trustee;

19 ii) Enjoined Conduct re Bank Accounts: No covered entity or individual shall
20 open, or cause to be opened, any account, whether business or personal, that can receive or send
21 money or anything of value, at any company including banking, financial, or similar institutions
22 and/or receive, directly or indirectly, any funds drawn from ACH electronic fund transfers;

23 **2. Execution of ACH Transfer:** All covered entities and individuals (defined below) are
24 hereby enjoined and prohibited from interfering with any ACH electronic funds transfer being
25 executed pursuant to documents authorizing such transfers to be executed in favor of LPG as follows:

26 a) Covered Entities and Individuals: All companies capable of processing ACH
27 electronic funds transfers, including EPPS; EquiPay; Merit Fund; Authorize.net; World Global;
28 Optimum Bank; BankUnited; Marich Bein; Revolv3; FIS; Guardian; and/or any entity associated

1 with the ACH identification transaction “LPG 949-226-6262 #5 2363 RT 9 TOMS RIVER NJ 0875”
2 or any such substantially similar ACH identification transaction are enjoined absent further order of
3 this court, from:

4 i) Enjoined Conduct re ACH Transfers: No covered entity or individual shall
5 transfer, wire, divert or otherwise permit the withdraw any funds received from any ACH electronic
6 funds transfer on any client file, financial institution, or current or former client of LPG, to or for the
7 benefit of LPG or any or more of its alleged assignees or transferees, including but not limited to
8 OakStone; Greyson; Gallant; Phoenix; LGS Holdco., LLC; CLG and/or Maverick to any financial
9 account maintained, owned or controlled by Vulcan; Coast Processing; Prime Logix; SCS; Tony
10 Diab; Rosa Loli; Lisa Cohen; Eng Tang; Maria Eeya Tan; Jake Akers; Jayde Trinh; Wes Thomas;
11 Scott James; Eadie, Jummi Chhor; Dongliang Jiang; and/or any other alias’, agents or corporate
12 entities affiliated with same. All ACH funds held by any covered entity or individual shall be held in
13 trust until such time as written authorization and instruction is provided by Trustee;

14 ii) Injunction Mandating Turnover to Trustee: all covered entities and
15 individuals shall hold in trust any and all funds, receipts, and transfers related to any account, file, or
16 current or former client of LPG; OakStone; Greyson; Phoenix; LGS Holdco., LLC; CLG; Maverick;
17 Vulcan; Coast Processing; Prime Logix; SCS; Tony Diab; Rosa Loli; Lisa Cohen; Eng Tang; Maria
18 Eeya Tan; Jake Akers; Jayde Trinh; Wes Thomas; Scott James; Eadie, Jummi Chhor; Dongliang
19 Jiang; and/or other alias’, agents or corporate entities affiliated with same until expressly directed to
20 release, wire or transfer such funds by the Trustee and to a bank account whose information shall be
21 provided with any such request; and, shall upon request by the Trustee provide an accounting of any
22 and all such funds held in trust to the Trustee upon written request within 10 days of said request;

23 3. LPG; OakStone; Greyson; Gallant; Phoenix; LGS Holdco., LLC; CLG; SCS; Vulcan;
24 Coast Processing; Prime Logix; SCS; Tony Diab; Rosa Loli; Lisa Cohen; Eng Tang; Maria Eeya
25 Tan; Jake Akers; Jayde Trinh; Wes Thomas; Scott James; Eadie, Jummi Chhor; Dongliang Jiang;
26 and/or any other alias’, agents or corporate entities affiliated with same are hereby enjoined and shall
27 not incur, take out or pledge any receivables of LPG; OakStone; Greyson; Gallant; Phoenix; Prime
28 Logix; SCS; Maverick; and/or CLG without seeking leave of court;

1 4. Any and all funds held at Bank of America on behalf of Prime Logix and/or Vulcan,
2 including but not limited to account Nos. ending in xxx951 and xxx9021 and/or any other financial
3 accounts having received funds originating from LPG; OakStone; Greyson; Gallant; Phoenix; LGS
4 HoldCo., LLC; CLG; and/or Maverick shall be held in trust and shall not be withdrawn, wired,
5 drawn against, moved, or otherwise transferred without the express consent of the Trustee in writing
6 and to a financial account identified by the Trustee at the time the authorization is provided.

7 **LOCKOUT ORDER**

8 From the date of this **ORDER**:

9 1. All persons identified below are enjoined and shall not access or attempt to gain access
10 whether physically, remotely, electronically, or virtually to the following locations associated with
11 LPG; OakStone; Greyson; Gallant; Phoenix; LGS Holdco., LLC; CLG; Maverick; Vulcan; Coast
12 Processing; Prime Logix; SCS; Tony Diab; Rosa Loli; Lisa Cohen; Eng Tang; Maria Eeya Tan; Jake
13 Akers; Jayde Trinh; Wes Thomas; Scott James; Eadie, Jummi Chhor; Dongliang Jiang; and/or any
14 other alias', agents or corporate entities affiliated with same: a) 3343 Michelson Drive, Suite 400,
15 Irvine, California 92612; b) 17542 17th St Suite 100, Tustin, California 92780; b) Luna's domain
16 located on AWS; c) DPP Data or accounts; d) Accounting Data and/or accounts on NetSuite,
17 Quickbooks and Microsoft SharePoint, G-Suite or other permanent or cloud based systems; e) ACH
18 processing accounts, whether individual, merchant or business, held at any ACH processing or
19 affiliated financial institution, including but not limited to EPPS; EquiPay; Merit Fund;
20 Authorize.net; World Global; Optimum Bank; BankUnited; Marich Bein; Revolv3; FIS; Guardian;
21 and/or any entity associated with the ACH identification transaction "LPG 949-226-6262 #5 2363
22 RT 9 TOMS RIVER NJ 0875" or any such substantially similar ACH identification transaction; f)
23 Vulcan and/or PrimeLogix' financial accounts at Bank of America, including but not limited to
24 Account Nos. ending in xxx951 and xxx9021; and g) the Email Data, as follows:

25 i) Tony Diab;

26 ii) Rosa Loli aka Rosa Bianca Loli aka Bianca Loli;

27 iii) Lisa Cohen;

28 iv) Daniel March;

1 v) Eng Taing;
2 vi) Maria Eeya Tan;
3 vii) Jake Akers;
4 viii) Han Trinh;
5 ix) Jayde Trinh;
6 x) Wes Thomas;
7 xi) William Taylor "Ty" Carss;
8 x) Scott James Eadie;
9 xi) Jimmy Chhor;
10 xii) Brad Lee; and
11 xiii) Dongliang Jiang.

12 **ORDER TO RE-DIRECT MAIL**

13 From the date of this **ORDER**:

14 1. Trustee is hereby authorized to instruct the United States Postal Service to re-direct any
15 and all mail processed by the United States Postal Service Directed to: a) LPG, 17542 17th St Suite
16 100, Tustin, California 92780; b) OakStone, 888 Prospect Street, Suite 200 La Jolla, California
17 92037; c) Phoenix, 3343 Michelson Drive, Suite 400, Irvine, California 92612; d) Prime Logix, 3343
18 Michelson Drive, Suite 400, Irvine, California 92612; e) CLG, PO Box 412 Elmsford, NY 10523; f)
19 Greyson, 3343 Michelson Drive, Suite 400, Irvine, California 92612; and/or any other address
20 associated with such entities, shall be forwarded and re-directed to an address provided by the Trustee
21 until such time as ordered by the Court.

22 **ORDER TO SHOW CAUSE RE WHY A PRELIMINARY INJUNCTION SHOULD NOT**
23 **ISSUE AND LIMITED EXAMINATION**

24 Tony Diab, Lisa Cohen, Rosa Loli, Daniel March, and William Taylor "Ty" Carss are hereby
25 ordered, provided that the summons and complaint in this adversarial proceeding captioned above
26 have been served upon said individuals, to appear on **Monday, June 12, 2023, at 1:30 pm** in
27 Courtroom 5C of the above captioned court located at 411 W. Fourth Street Santa Ana, California
28 92701:

1 1. For an order to show cause regarding why a preliminary injunction should not issue
2 regarding the Court's forgoing Temporary Restraining Order; and

3 2. To sit for a limited examination before the Court regarding the \$6,308,702.72 million
4 dollars in ACH EFTs processed through Revolv3, Inc. from March 2023 to the present, and other
5 ACH ETFs processed post-petition through EPPS; EquiPay; Merit Fund; Authorize.net; World
6 Global; Optimum Bank; BankUnited; Marich Bein; Revolv3; FIS; Guardian; and/or any entity
7 associated with LPG and or the ACH identification transaction "LPG 949-226-6262 #5 2363 RT 9
8 TOMS RIVER NJ 0875" or any such substantially similar ACH identification transaction; or any
9 other ACH process company LPG; OakStone; Greyson; Gallant; Phoenix; LGS Holdco., LLC; CLG;
10 Maverick; Vulcan; Coast Processing; Prime Logix; SCS; or any ACH EFTs known to Tony Diab;
11 Rosa Loli; Lisa Cohen; Eng Tang; Maria Eeya Tan; Jake Akers; Jayde Trinh; Wes Thomas; Scott
12 James; Eadie, Jummi Chhor; Dongliang Jiang relating in any way to LPG or current or former
13 customers of LPG; and/or any other alias', agents or corporate entities affiliated with same have used,
14 initiated ACH EFTs, opened an account with or maintained since March 20, 2023.

15 **NOTICE TO LPG CLIENTS**

16 Trustee is hereby authorized to provide notice to any and all LPG clients, including those
17 transferred and/or assigned to OakStone; Greyson; Gallant; Phoenix; LGS Holdco., LLC; CLG;
18 and/or Maeverick regarding: i) LPG's Bankruptcy filing; ii) pending evaluation of their file; and iii)
19 status prior to assuming or rejecting their contract in substantially the same form of notice attached
20 to this Order as Exhibit 1.

21 ###

22
23
24 Date: 5/26/23

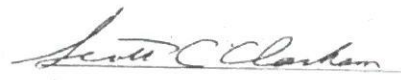
25 
26 Honorable Scott C. Clarkson
27 United States Bankruptcy Judge
28

Exhibit 1

[Client Name]
[Date]
[Address Line 1]
[Address Line 2]
[Address Line 3]
Tel:
Email:

**RE: STATUS REGARDING YOUR MATTER WITH THE
LITIGATION PRACTICE GROUP**

Dear [Name],

Please be advised that on May 20, 2023, The Litigation Practice Group ("LPG") filed for protection under Chapter 11 of the Bankruptcy Code. On May 8, 2023, the United States Bankruptcy Court—Central District of California, Case No. 8:23-bk-10571, appointed Richard Marshack, Esq. as the duly appointed Chapter 11 Trustee to oversee the administration of LPG's Bankruptcy matter. See Docket No. 65.

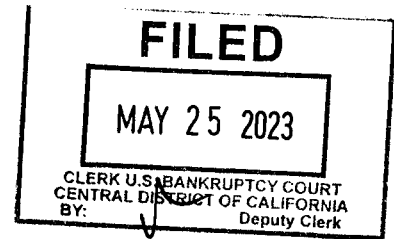
Subsequently, the United States Bankruptcy Court authorized Trustee to obtain information in order to review and evaluate the status of your file at LPG and/or any other debt relief law firm your file may have been transferred or assigned to at or around the time LPG filed for Bankruptcy, including but not limited to OakStone Legal Group, P.C.; Greyson Law, P.C.; Gallant Law Group; Phoenix Law Group, P.C.; LGS Holdco., LLC; Consumer Legal Group, P.C and/or Maverick Management, LLC.

Over the coming weeks, Trustee Richard Marshack will provide status of your file and continuation of legal services pursuant to the Legal Services Agreement with LPG.

We greatly appreciate your patience and cooperation while we work on your behalf.

Sincerely,

[Signatory name]



Christopher B. Ghio (State Bar No. 259094)
Christopher Celentino (State Bar No. 131688)
Jeremy B. Freedman (State Bar No. 308752)
DINSMORE & SHOHL LLP
655 West Broadway, Suite 800
San Diego, CA 92101
Telephone: 619.400.0500
Facsimile: 619.400.0501
christopher.ghio@dinsmore.com
christopher.celentino@dinsmore.com
jeremy.freedman@dinsmore.com

Proposed Special Counsel to Richard A. Marshack

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA - SANTA ANA DIVISION

In re:
THE LITIGATION PRACTICE GROUP P.C.,
Debtor.

RICHARD A. MARSHACK,
Chapter 11 Trustee,

Plaintiff,

v.

TONY DIAB, an individual; DANIEL S.
MARCH, an individual; ROSA BIANCA LOLI,
an individual; LISA COHEN, an individual;
WILLIAM TAYLOR CARSS, an individual;
ENG TANG, an individual; MARIA Eeya TAN,
an individual; JAKE AKERS, an individual; HAN
TRINH, an individual; JAYDE TRINH, an
individual; WES THOMAS, an individual;
SCOTT JAMES EADIE, an individual; JIMMY
CHHOR, an individual; DONGLIANG JIANG,
an individual; OAKSTONE LAW GROUP PC;
GREYSON LAW CENTER PC; PHOENIX
LAW GROUP, INC.; MAVERICK
MANAGEMENT, LLC; LGS HOLDCO, LLC;
CONSUMER LEGAL GROUP, P.C.; VULCAN
CONSULTING GROUP LLC; B.A.T. INC. d/b/a
COAST PROCESSING; PRIME LOGIX, LLC;
TERACEL BLOCKCHAIN FUND II LLC;
EPPS; EQUIPAY; AUTHORIZE.NET; WORLD
GLOBAL; OPTIMUMBANK HOLDINGS, INC.

Case No.: 8:23-bk-10571-SC

Adv. Proc. No.

Chapter 11

**MEMORANDUM OF POINTS AND
AUTHORITIES IN SUPPORT OF
TRUSTEE, RICHARD A. MARSHACK'S
MOTION FOR PERMISSION TO FILE
OMNIBUS EMERGENCY MOTION
AFTER SERVICE OF COURTESY COPY
AND AFTER HEARING, AND UNDER
SEAL**

Date: May 26, 2023

Time: **T.B.D. By Clerk of Court**

Judge: Hon. Scott C. Clarkson

Place: Courtroom 5C

411 W. Fourth Street
Santa Ana, CA 92701

EXHIBIT E

d/b/a OPTIMUM BANK; MARICH BEIN, LLC;
BANKUNITED. N.A.; REVOLV3. INC.;
FIDELITY NATIONAL INFORMATION
SERVICES, INC. d/b/a FIS; WORLDPAY, INC.;
WORLDPAY GROUP; MERIT FUND, LLC;
GUARDIAN PROCESSING, LLC; THE
UNITED STATES POSTAL SERVICE; and
DOES 1 through 100, inclusive,

Defendants.

MEMORANDUM OF POINTS AND AUTHORITIES

Richard A. Marshack ("Trustee" or "Plaintiff"), the Court-appointed Chapter 11 Trustee in the Chapter 11 Bankruptcy Case No. 8:23-bk-10571-SC and Plaintiff in the as yet to be filed Adversary Case No. 1 which will be appended to the OMNIBUS EMERGENCY MOTION FOR: 1) TURNOVER OF ESTATE PROPERTY AND RECORDED INFORMATION PURSUANT TO 11 U.S.C. § 542; 2) PRELIMINARY INJUNCTION; 3) LOCK-OUT; 4) RE-DIRECTION OF UNITED STATES PARCEL SERVICES MAIL; AND 5) ISSUANCE OF ORDER TO SHOW CAUSE RE COMPLIANCE WITH COURT ORDER; AND [PROPOSED] ORDER THEREON ("Omnibus Emergency Motion"), hereby respectfully submits EMERGENCY MOTION FOR PERMISSION TO FILE OMNIBUS EMERGENCY MOTION AFTER SERVICE OF COURT'S COURTESY COPY AND AFTER HEARING, AND UNDER SEAL ("Seal Motion"), pursuant to Local Rule 5003-2(c) and 11 U.S.C. § 107, to prevent filed copies of the within Motion from appearing on the docket until such relief, if any be granted by the Court, can be effected.

I. INTRODUCTION.

This Seal Motion is made on the grounds that the facts alleged and relief requested in the Omnibus Motion for Turnover of Bankruptcy Property contain confidential research as it pertains to claims the Trustee is investigating, analyzing and pursuing as to third parties who may be liable to the bankruptcy estate for losses, damages, or other forms of harm. It is critical that the work performed by Dinsmore & Shohl LLP ("Dinsmore") on these matters, including on the assessment of various potential claims and litigation strategies, remains confidential. Were such information to be disclosed publicly, it could materially disadvantage the bankruptcy estate and the Trustee's efforts to secure the

1 maximum recovery. Accordingly, the Trustee requests permission to file under seal his Omnibus
2 Emergency Motion.

3 II. DISCUSSION.

4 Local Rule 5003-2(c) provides, “[s]ubject to 11 U.S.C. § 107, a document may not be filed
5 under seal without a prior written order of the court.” “On request of a party in interest, the bankruptcy
6 court *shall*... protect an entity with respect to a trade secret or *confidential research*, development,
7 or commercial information.” 11 USC § 107(b)(1).

8 “A party seeking to seal a judicial record then bears the burden... by meeting the compelling
9 reasons standard. That is, the party must articulate compelling reasons supported by specific factual
10 findings... that outweigh the general history of access and the public policies favoring disclosure...”
11 *Kamakana v. City & Cty. of Honolulu*, 447 F.3d 1172, 1178-79 (9th Cir. 2006). “Relevant factors
12 include the public interest in understanding the judicial process and whether disclosure of the material
13 could result in improper use of the material for scandalous or libelous purposes or infringement upon
14 trade secrets.” *Id.* at 679, n.6 (internal citations and quotations omitted). “In general, compelling
15 reasons sufficient to outweigh the public’s interest in disclosure and justify sealing court records exist
16 when such court files might have become a vehicle for improper purposes, such as the use of records
17 to gratify private spite, promote public scandal, circulate libelous statements, or release trade secrets.”
18 *Kamakana*, 447 F.3d at 1179 (internal citations and quotations omitted).

19 Here, compelling reasons exist to prevent the public disclosure of the Trustee’s Omnibus
20 Motion. The Trustee’s Omnibus Motion reveals the Trustee’s confidential research and investigation
21 into the Debtor’s conduct and transactions, and includes information concerning the potential claims,
22 defenses, and litigation strategies. Specifically, the information contained in the Omnibus Motion
23 reveals the Trustee’s strategies to regain assets which appear to have been fraudulently transferred
24 from the bankruptcy estate. The information would alert the Debtor of the Trustee’s investigation and
25 allow the Debtor to thwart the Trustee’s efforts by diverting further assets from the Bankruptcy estate
26 into other entities. Further, the Omnibus Emergency Motion contains confidential research and
27 reveals the Trustee’s strategy throughout its entirety, not just in portions, therefore the Trustee
28 requests the Court’s permission to file the Omnibus Emergency Motion under seal in its entirety.

1 The Omnibus Emergency Motion relies on confidential information obtained from the factual
2 investigation conducted by Trustee's counsel. For example, Trustee's general counsel, Ed Hays
3 caught the Debtor's person most knowledgeable concerning LPG's dealings with vendors, Tony Diab
4 ("Diab"), in an outright lie regarding his access to LPG's merchant portal and confirming that in
5 excess of \$6,000,000 dollars have been diverted from Debtor in the post-petition period. (Declaration
6 of Trustee Richard Marshack in Support of Omnibus Emergency Motion "Marshack Decl." at ¶¶ 6-
7 7.)

8 Exigent circumstances exist to grant the requested relief. It is anticipated that Diab by and
9 through the entities he controls will continue to initiate ACH transfers of client funds – to which LPG
10 is entitled – including for the bulk of LPG's prior clients on June 1, 2023, which is expected to exceed
11 \$1 million dollars. Without an order granting the requested injunctive relief, Mr. Diab would again
12 have the ability to transfer such funds to other corporate entities he controls, including Vulcan
13 Consulting, Maverick Management, LLC, Prime Logix, LLC among many others under his control.
14 (Marshack Decl, at ¶ 15.)

15 As such, property of Debtor's Estate as set forth in the Omnibus Emergency Motion and
16 proposed order, is at great risk of further dissipation, loss, destruction, and fraudulent transfer.
17 (Marshack Decl, at ¶ 16.) In fact, it has been brought to the Trustee's attention that Diab is in the
18 process of creating new corporate entities in furtherance of his attempts to transfer property in which
19 Debtor has an interest as part of his deliberate efforts to hinder, delay, and defraud LPG's creditors.
20 (*Id.*)

21 The Omnibus Emergency Motion, if not filed under seal, would give Diab notice of the
22 Trustee's strategy and would give Diab an opportunity to transfer the property into other entities
23 which have not yet been discovered by the Trustee. Therefore, the Trustee respectfully requests the
24 Omnibus Emergency Motion be filed under seal in order to allow the Trustee to stop the dissipation
25 of property.

26 ///

27 ///

28 ///

III. CONCLUSION.

For the foregoing reasons, the Trustee requests permission to file his Omnibus Emergency after service of Court's courtesy copy and after hearing, and under seal. The Trustee further requests this Court hold an emergency hearing without notice to grant restraining orders to protect the status quo and prevent further dissipation of estate property.

Dated: May 25, 2023

Respectfully submitted,

DINSMORE & SHOHL LLP

By: /s/ Christopher B. Ghio
Christopher B. Ghio
Christopher Celentino
Proposed Special Counsel to
Richard A. Marshack

FILED & ENTERED

MAY 26 2023

CLERK U.S. BANKRUPTCY COURT
Central District of California
BY bolte DEPUTY CLERK

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
SANTA ANA DIVISION

In re:

THE LITIGATION PRACTICE GROUP,
P.C.

Misc. Case No.: 8:23-mp-00102-SC
Ch 11 Case No. 8:23-bk-10571-SC

CHAPTER 11

ORDER GRANTING MOTION TO SEAL

Date: May 25, 2023
Time: 4:00 p.m.
Courtroom: 5C

Debtor(s).

Upon consideration of the Motion to Seal filed by Chapter 11 Trustee Richard Marshack on May 25, 2023, and for good cause shown, it is hereby ORDERED as follows:

1. The Motion to Seal is GRANTED pursuant to 11 U.S.C. Section 107.
2. The following documents shall be sealed and restricted from public access:
 - a. Motion to Seal

EXHIBIT F

- b. Trustee, Richard Marshack's Omnibus Emergency Motion for: (1) Turnover of Estate Property and Recorded Information Pursuant to 11 U.S.C. §542; (2) Preliminary Injunction; (3) Lock-out; (4) Re-direction of United States Parcel Services Mail; (5) Order to Show Cause re: Compliance with Court Order; (6) Other Relief as Necessary to the Efficient Administration of this Matter.
 - c. Declaration of Russ Squires
 - d. Declaration of Darius Newbold
 - e. Declaration of Richard Marshack
 - f. Declaration of Christopher Ghio
 - g. Related Adversary Complaint
3. The Clerk of Court is directed to implement appropriate measures to restrict public access to the sealed documents listed in paragraph 2, in accordance with the Court's procedures and applicable laws and regulations.
 4. Parties to this case, their respective attorneys, and any other individuals who have access to the sealed documents shall maintain the confidentiality of the sealed documents and shall not disclose their contents or any information contained therein, except as otherwise required by law or with the express permission of the Court.
 5. This Order shall remain in effect until further order of the Court.

IT IS SO ORDERED.

Date: May 26, 2023


Scott C. Clarkson
United States Bankruptcy Judge

1 UNITED STATES BANKRUPTCY COURT
2 CENTRAL DISTRICT OF CALIFORNIA
3 --oOo--
4 In Re:) Case No. 8:23-bk-10571-SC
5 THE LITIGATION PRACTICE GROUP) Chapter 11
6 P.C.,)
7 Debtor.) Santa Ana, California
8) Monday, June 12, 2023
9) 1:30 p.m.
10)
11 MARSHACK,) Adv. No. 8:23-ap-01046-SC
12 Plaintiff,)
13 vs.)
14 DIAB, ET AL.,)
15 Defendants.)
16
17 HEARING RE: PRELIMINARY
18 INJUNCTION
19
20 STATUS CONFERENCE HEARING RE:
21 (1) CASE MANAGEMENT CONFERENCE
22 AND (2) REQUIRING STATUS
23 REPORT
24
25 TRANSCRIPT OF PROCEEDINGS
BEFORE THE HONORABLE SCOTT CLARKSON
UNITED STATES BANKRUPTCY JUDGE

Proceedings recorded by electronic sound recording;
transcript produced by transcription service.

Briggs Reporting Company, Inc.

EXHIBIT G

1 law firm which has 48 confirmed clients and there is some
2 dispute as to whether or not those clients ever were in the
3 LPG, Oakstone, Gallant, Phoenix system or not. Those 48
4 clients with an expected monthly ACH pull of roughly \$15,000
5 are clients of a law firm that has a payroll -- according to
6 that law firm's director of human resources, they have a
7 payroll -- assuming the hourly employees only work one hour
8 a year, the payroll is \$5.67 million a year or 565,000 a
9 month.

10 So in the last few weeks, the direction was given
11 to pull the LPG client money, and then the direction was
12 given for that money to go to Prime Logix or Maverick. And
13 that money was used at those locations to either compensate
14 personnel at Greyson and/or personnel at Phoenix and/or a
15 series of other purposes that were detailed to the to the
16 Court. The point of course being no rational person would
17 run a law firm at a \$5-million annual human resources cost
18 with a current revenue of 15,000 a month and continue to
19 have the pulls come from the Chapter 11 Debtors' account on
20 behalf of Chapter 11 Debtor clients. He wouldn't be
21 operating that law firm legitimately.

22 It does not appear -- and this is one thing I want
23 to credit the folks that are appearing on behalf of Greyson.
24 We are going to want to modify -- the trustee is going to
25 want to amend its complaint. It does not appear that

1 Greyson is an alter ego. I'll take it at face value that
2 it's not, and that the two parties that founded it decided
3 to found it just for the purpose of siphoning the money from
4 LPG, not as an alter ego of LPG, but as an attempt to
5 destroy LPG and/or Phoenix.

6 So I believe, your Honor, the point here is I'm
7 happy, very happy to have Greyson, to the extent that the
8 services they're providing are being provided legally, take
9 their 48 clients and pay back the hundreds of thousands of
10 dollars of LPG money that has been utilized by them to pay
11 their employees.

12 Now, you're going to hear from Greyson, that
13 they're upset at the trustee because they had a payroll that
14 they were hoping that would go out on June 2nd, and they had
15 a payroll they were hoping would go out this Friday. And
16 you can explain to them as much as I have explained to them,
17 your order doesn't put the trustee in charge. The order
18 enjoins the use of the money. But the notion that they're
19 upset that their attempt to take that money, regardless of
20 who authorized them to do so, from LPG clients for the
21 purposes of paying the expenses of a myriad of employees.
22 You can see in Mr. Plazak's papers, there are a myriad of
23 employees that work there that they were hoping LPGs
24 authorization would pay.

25 So when we get to what the injunction should look

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
10524 W. Pico Blvd., Ste. 212, Los Angeles, CA 90064

A true and correct copy of the foregoing document entitled (*specify*): **NOTICE OF MOTION AND MOTION OF HAN TRINH FOR AN ORDER GRANTING ALLOWANCE AND PAYMENT OF ADMINISTRATIVE CLAIM, PURSUANT TO 11 U.S.C. §503(b)(1)(A)(i); HAN TRINH DECLARATION W/EXHS., PHUONG (AKA JAYDE) TRINH DECLARATION, KATHLEEN P. MARCH, ESQ DECLARATION W/EXHS.** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) 11/17/23, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

See next page

☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (*date*) 11/17/23, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

The Litigation Practice Group P.C.
17542 17th St
Suite 100
Tustin, CA 92780

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) 11/17/23, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Hon. Scott Clarkson
United States Bankruptcy Court
411 West Fourth Street, Suite 5130
Santa Ana, CA 92701-4593

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

11/17/23
Date

Kathleen P. March
Printed Name

/s/ Kathleen P. March
Signature

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